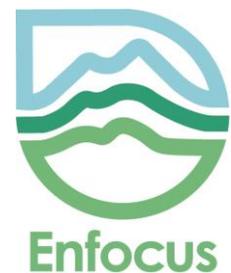


# Review of the objectives of the Proposed Natural Resources Plan for the Wellington Region

A Report for Greater Wellington

*Gerard Willis, 14 July 2017*



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## Executive Summary

This report reviews the 59 objectives of the Proposed Natural Resources Plan for the Wellington Region.

It seeks to identify linkages between the objectives and any areas of duplication that would warrant resolving through the rewording or deletion of individual objectives or groups of objectives. A key line of inquiry is whether there is a hierarchy of objectives (i.e. strategic or overarching objectives) that should be highlighted and expressly acknowledged.

The objectives are mapped against relevant legislative and policy imperatives to understand the basis for the objectives set.

A revised framework for organising the objectives is highlighted as a means of better communicating the breadth of objectives, the groupings and the relationships between each group.

The report concludes that the relationship between individual objectives is complex. That complexity would not be accurately reflected by having separate lists of “over-arching” and “contributing” objectives. Certainly the first five objectives do not provide that strategic framework. That is not to say that some objectives are not broad while others are narrow. That is clearly the case. However, as worded, the objectives are far more interdependent than can be captured by a simple “two-tier” structure.

The report also concludes that, by and large (and subject to comments below), there is nothing inherently problematic with the suite of objectives proposed. There are eight objectives that have a particular focus (“recognising” certain issue or values) that will not be able to perform all the functions of an objective. The report proposes that those objectives could be contained in a separate section in acknowledgement that they are of a particular ilk. Suggestions are also made for combining certain objectives to improve the structure and clarity – although it is acknowledged that final wording will be dependent on submissions and evidence. It is suggested that several other objectives are best described as policies (although in some cases minor rewording would address the concern).

That is not to say that a case cannot be made for more radical change. A number of the objectives (particularly those dealing with specific activities) are not strictly necessary and, if there was a desire for streamlining of the objectives, could be dispensed with without compromising the functionality of the Plan. This report stops short of recommending such a change although an outline of a streamlined suite of objectives is provided (in Appendix B) for completeness.

# 1 Introduction

## 1.1 Introduction

Enfocus has been engaged by Greater Wellington to undertake an independent review of the objectives of the Proposed Natural Resources Plan for the Wellington Region (PNRP).

This report records the findings of that review.

As set out in the terms of reference (ToR) for this project, the need for this review has arisen because the Hearings Panel has expressed concern (in Minutes 3 and 10) that (from the Panel's perspective):

- It is not clear how the objectives relate to one another and whether there is any hierarchy between them;
- There appears to be some duplication between objectives; and
- There may be some objectives that focus on *how* things are to be done or *what* is to be done and hence might be better described as policies.

The review seeks a fresh look at the objectives to determine whether the Panel's concerns are well-founded and, if so, what changes may be made to remedy any problems or shortcomings.

## 1.2 Preliminary observations

At the heart of this task lies the fundamental questions of "what is an objective" and "what role do objectives play in a plan"?

As noted in *Ngati Kahungunu*<sup>1</sup>, there has not been judicial enquiry into those questions. The *Ngati Kahungunu* case itself usefully suggested that:

*an objective in a planning document sets out an end state of affairs to which the drafters of the document aspire, and is the overarching purpose that the policies and rules of the document ought to serve.*

However, within that broad definition many different approaches would seem possible. The Court's consideration in *Ngati Kahungunu* did not suggest what was, and was not, an appropriate form of objective.

There has, on the other hand, been judicial consideration of what a *policy* is and may be in an RMA plan. In the oft-quoted decision *Auckland Regional Council v North Shore City Council*<sup>2</sup>, the Court of Appeal found that a policy was a "course of action" that "could be either flexible or inflexible, broad or narrow". The judge determined that counsel was "*on unsound ground in suggesting that, in everyday New Zealand speech or in parliamentary drafting or in etymology, policy cannot include something highly specific*".

I suspect that a similar view might be taken by the Court in respect of any suggestion that a particular objective was not an objective simply because it failed to comply with a particular form or format or level of specificity or detail. An objective must (consistent with *Ngati Kahungunu*) express some "end state of affairs" but, at law, it seems inevitable that end state may be expressed in a range of forms, contexts, scales or levels of detail.

While I think it important to record that point, there is a question of planning *practice* that is equally important, not for theoretical or semantic niceties but because

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<sup>1</sup> *Ngati Kahungunu Iwi Inc v Hawkes Bay Regional Council*, ENV-2013-WLG-000050

<sup>2</sup> *Auckland Regional Council v North Shore City Council* [1995] 3 NZLR 18, CA29/95

objectives worded in a particular way can provide meaningful benefit to the process of plan development and implementation.

### 1.2.1 Current practice in drafting objectives

In my observation, in practice there are at least two philosophies taken to the identification and drafting of objectives in plans.

The first is the *utilitarian* approach. Essentially that approach is based on the notion that objectives have a particular utility in the plan – e.g. they are there to help guide consent decision-making (along with policies). Hence this approach advocates objectives that are “outcomes” that are sought *from* the provisions that follow in the plan. They are not statements about what the council or the plan *will do* but rather what it sets out to *achieve*. From a grammatical perspective objectives developed in accordance with this approach generally would not start with or include a verb.

An example from the PNRP would be Objective O7 which reads:

*Freshwater is available in quantities and is of a suitable quality for the reasonable needs of livestock.*

That statement is clearly an outcome for the environment and one, I might add, that can both be measured and be used to assess the acceptability of a consent application.

The second approach is a less structured. It sees objectives as providing the *general context* within which policies, rules and other methods are developed and implemented. Objectives written in accordance with this approach will often not have any obvious or direct value in determining a consent application and will often focus on the outcome sought *for the plan* (rather than *for the environment*). They may help a plan user to understand why the policies and other provisions that follow are as they are. Another common characteristic is that they will often start with (or contain) a verb. Classic examples are objectives “to recognise” some particular issue or vulnerability. That recognition is then achieved by policies and methods that pay attention to the matter identified (either explicitly or implicitly). The end state of such objectives is often the end state *of the plan*.

An example is provided by Objective O8 of the plan which seeks as its end state that:

*The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan’s allocation framework.*

It is important to say at the outset that both styles are commonplace and often occur within the same document. A great many have survived scrutiny by the Courts. Accordingly, I do not understand there to be anything unlawful with either approach. As discussed earlier, we know from case law that the Courts have inferred that a policy can be anything from very specific to highly generalised and the same is undoubtedly true about objectives.

### 1.2.2 Objectives at different levels of specificity

Objectives can be expressed at different levels of specificity. Some can, and do, provide the broad framework that guides the development of more specific objectives. Again, I see nothing inherently wrong with that.

Objectives are not a “course of action” like a policy. One objective cannot *implement* another objective. However, the achievement of one objective can certainly be a prerequisite for the achievement of a higher order (or strategic) objective. One broad outcome can result from the achievement of many smaller outcomes. For example, achieving an objective related to a specific river or catchment may be a prerequisite

for achieving a broad objective to maintain water quality across a region. Hence objectives can be “nested”. (In all cases, however, the objective will be statement of what is to be achieved rather than an expression of *what* will be done).

Part of the difficulty in developing and structuring the objectives and policies of a resource management plan is that there are inter-relationships between them. As noted above, one objective can be dependent on the achievement of others. But it is more complex than that. One objective can be dependent on successful implementation of a range of policies (including policies affecting different resources and different activities). Similarly, a single policy can contribute to the implementation of more than one objective. For example, a policy on stock exclusion could implement objectives for both freshwater swimmability and ecological health.

The environment we manage is complex and interconnected. Placing plan provisions in neat, linear structures, though desirable, does not always work and sometimes the planner’s desire for “order and logic” needs to yield to the need to pragmatically reflect the complexities and interactions of the environment. As a general rule, the more high level an objective the broader the range of policies that will give effect to it.

Hard and fast rules around the articulation of objectives are not always possible or appropriate.

### 1.2.3 What makes an acceptable objective?

The above discussion simply aims to acknowledge that there isn’t necessarily a single right and wrong way to draft objectives. On the other hand, as indicated earlier, when you consider the functions that objectives must perform in the planning framework, good practice principles would suggest that, at least when viewed at the *collective* level, the objectives of a plan need to:

- (a) Provide the basis against which the plan’s effectiveness can be monitored (in accordance with section 35 (2) (b) of the Act)<sup>3</sup>;
- (b) Provide guidance (along with policies) for determining resource consent applications (in accordance with section 104 and 104D of the Act);
- (c) Be the most appropriate way (and be able to be assessed as the most appropriate way) to achieve the purpose of the Act (in accordance with section 32 (1) of the Act);
- (d) Provide the logical basis or foundation for the provisions (policies and methods/rules) that follow; and
- (e) Give effect (insofar and objectives can) to national policy statements and other national instruments.

Needless to say, plans will also be easier to understand and implement, and convey a greater sense of professionalism and integrity, if provisions avoid repetition, duplication, internal contradiction and have a clear flow of logic from problem/pressure<sup>4</sup> to solution/response.

In my opinion objectives may be expressed in different ways, including as “management principles” focusing on outcomes for the plan, for relationships or for practices. I think that to suggest that a plan cannot contain such objectives is

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<sup>3</sup> This is especially important in plans that do not contain “anticipated environmental results” as is the case with the PNRP.

<sup>4</sup> It may also be useful to note that plan objectives do not simply deal with extant problems that can be solved within a definable time period. The nature of resource management is that there will be on-going pressure on resource use that needs to be managed and objectives need to recognise that the issue is very often the *potential* for sub-optimal outcomes to emerge in the future.

unsupportable at law. But if the plan *only* contains those objectives it will be ineffective and uncertain because, in the end, a plan is about performing clear functions that require decisions to be made about how resources are used and what outcomes in the environment will be acceptable. Accordingly, a plan should contain sufficient objectives of the type described in (a) to (e) above to allow it to function with a clear focus on outcomes to be achieved *for, and in, the environment*.

I set the above out in some detail because it explains the understanding that I have applied to the analysis that follows.

## 2 Key questions of enquiry

The ToR asks this review to consider:

- a) the explicit and implicit linkages between objectives, including between any ‘over-arching’ and ‘activity’ or ‘topic specific’ objectives;
- b) any ‘mixed messages’, duplication or conflict in terms of the collective outcomes expressed for matters common to more than one objective;
- c) whether any duplication could be removed without changing the collective outcomes sought in the objectives; and
- d) whether, if any objectives might be more appropriately recast as policies if they are deemed to be ‘implementing’ other objectives.

More specifically, the ToR further asks that, having considered the related policies, whether:

- a hierarchy of overarching objectives need to be explicitly identified;
- any topic-specific objectives need to be deleted;
- any, or all, overarching objectives may be considered redundant or edited to avoid confusion with topic specific objectives; and
- the suite of objectives can remain unchanged.

### 2.1 Structure: Grouping of objectives

In this section I comment solely on the grouping of objectives - that is, the division of the 59 objectives into 13 “themes” (sections 3.1 to 3.13). To understand the linkages that exist it is first necessary to understand the structural framework applied to organise the objectives.

My first observation is that Chapter 3 is presented as a complex framework. Objectives are grouped variously according to:

- *resource type* (e.g. biodiversity, air, soil);
- council *function* (e.g. water allocation and coastal management);
- *activity/threat* (e.g. land use, discharges);
- *values* (natural character and sites with significant values); and
- more abstract themes (“mountains to the sea”, beneficial use and development).

In my opinion, that grouping does not assist in conveying a coherent approach. I return to that issue in section 2.1.2

### 2.1.1 Strategic Objectives

Implicit in the questions posed by the ToR is the suggestion that Objectives 1 to 5 may be the strategic or “higher level” objectives to which all others contribute. I am not sure that is (or should be) the case. I don’t consider there to be anything more strategic about sustaining Mauri (O4), for example, then maintaining Maori relationships (O14) or recognising kaitiakitanga. Nor is Objective O23 (to maintain or improve water quality) less “strategic” or overarching than Objective O5 which seeks water body management to achieve three express values (ecosystem health, customary use and human health).

I think to label Objective 1-5 as strategic objectives (even if their ambit was extended to include air as some has suggested) would be to force on them a role and purpose for which they were not designed. It may give rise to the need for more extensive revision of the balance of the objectives.

I note from the evidence of Ms Greenberg that Objectives 1-5 appear to play a role in implementing the five so-called “policy goals” that are said to underpin the PNRP. However, the five overarching and cross-cutting policy goals described by Ms Greenberg, while discussed extensively in evidence, are not expressly articulated in the PNRP and do not, in any event correspond directly to Objectives 1-5. Hence to the extent that there may be said to be “strategic goals” influencing the design and focus of the PNRP’s objectives they are clearly not intended to be Objectives 1-5. That is clear on the face of Ms Greenberg’s evidence.

Strategic objectives have been used in other plans. They can be useful as “touchstones” to be used during the hearing process to assist in determining whether lower order provisions are consistent with the strategic direction of a planning document. However, there is also potential for strategic objectives to give rise to later implementation issues. Those can focus on whether, in the event of conflict between strategic objectives and other objectives and policies, the strategic objectives should prevail or the more specific lower order objectives should prevail.

In my understanding, the general rule is that unless otherwise stated, all objectives and policies have equal weight. The exception being that (consistent with general rules of statutory interpretation) more specific provisions (i.e. those addressing the particular issue or circumstance under consideration) prevail over more generally expressed provisions. So, for example, a general objective to “protect water bodies from the effects of farming activities” could not be relied on to impose restrictions on stock access more stringent than those imposed by objectives and policies that specifically address stock exclusion and impose a less than comprehensive stock exclusion regime.

Accordingly, I would recommend refraining from labelling and/or reformulating Objectives 1 to 5 as “strategic” or higher order objectives unless the Hearing Panel considers that higher order, strategic objectives could serve some meaningful and useful role. If that is the case the Panel should look beyond Objectives 1 to 5. That said, as I discuss later, there may well be a need to distinguish between objectives that have a general application in articulating an underpinning philosophy and those that are focused on specific environmental outcomes<sup>5</sup>.

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<sup>5</sup> Similarly, there are arguably some higher order objectives (being objectives to which several lower order objectives might be said to contribute). These are discussed later. At this point I note only that the higher order, “cross cutting” or overarching objectives are not necessarily limited to those in section 5.

### 2.1.2 Rationale behind grouping of objectives

It is not clear to me what framework inspired the groupings of objectives. It bears close relationship to the framework used to organise the policies but it is not an exact match. (No water quality, soil or land use sections appear in Chapter 4<sup>6</sup>).

To better understand the *potential* rationale I have mapped all 59 objectives to Part 2 of the Act, national policy instruments and the RPS (see Table A1 - Appendix A).

It seems reasonably clear from that analysis that no one set of higher order policy imperatives provides the framework for the 13 themes (and certainly not the RPS whose framework is quite challenging to relate to the framework of the PNRP). Some themes (such as 3.3, 3.4 and 3.7) seem closely tied to sections 6 and 7 of the Act. Other themes (particularly 3.5) more closely relate to national policy instruments. Theme 3.2 seems rooted in the enabling dimension of section 5(2) of the Act. Theme 3.11 (discharges) seems related to council's section 30(1)(f) function.

It is difficult to group objectives into defined themes when an overriding goal is to promote *integration* of management of an interconnected environment with cross cutting pressures and interconnected outcomes. By definition, grouping objectives under common themes implies that there are unique and distinct themes around which objectives can be clustered. While that is true to some extent, it is clearly not the case for water quality outcomes that, for example, have underpinning goals relating to cultural, ecological, recreational and human health values. Similarly, water quality and ecological health outcomes require management of land use, point and non point discharges, riparian management and restoration, specific activities like livestock access and much more. That all makes defining clear boundaries between outcomes difficult. In that context any framework will be imperfect.

## 2.2 The framework rationalised

In designing any framework the key is to ensure it is easily followed and duplication avoided as much as possible. In that regard, my observation is that there is some room for improvement in the section 3.1 to 3.11 framework.

In my opinion, one of the easiest ways to explain the framework without requiring radical change would be as per Table 1 below. I put this forward not necessarily as an alternative framework for adoption in the plan but as a means to explain the different types of objective that appear to exist and, to some extent, the relationship between groups of objectives.

Table 1 does two key things. First, it splits the objectives into:

- (a) those that aim at what outcomes are sought *for the plan* and the way it is implemented; and
- (b) those that aim specifically at outcomes sought in the environment from plan implementation.

That approach avoids the need to redraft objectives that do not currently fit the strict "outcome style" by acknowledging those objectives are of a different ilk (but nevertheless remain valid). I have identified eight objectives in that category. They are objectives that have a whole-of-plan/whole-of-environment application and all have a focus on "recognising". They are not necessarily "strategic" but they do provide the plan users with an understanding of the thinking that has been applied to the way the provisions have been designed (and will be applied).

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<sup>6</sup> The other ten section headings are common between the objective and policy chapters - although the content is not also always an obvious match between the two.

Secondly, Table 1 clusters the second group of 52 objectives around sub-themes being:

- *Use and development of resources for people's well-being.* These seven objectives include many of those from section 3.2 with two additions from other sections that seem to sit most comfortably in this category.
- *Managing for environmental values.* These include 17 objectives that focus on specific outcomes for specific aspects of the environment (values or attributes). These can be broadly split by resource – soil, air, water, ecosystems and the coast.
- *Managing specific risks to land, water, air, the coast and people.* These include 15 objectives that focus on particular threats, pressures or risks (often activities) rather than outcomes per se. All the section 3.11 discharge objectives are in this category – along with those relating to noise and natural hazard/climate risks.
- *Managing places and sites with special values.* These 10 objectives focus on places and sites rather than applying to a resource generally or to an activity/risk generally. They include the objectives of section 3.7 plus two others (relating to trout habitat and estuaries – which seem to me place specific).
- *Efficient use of resources.* These two objectives have a primary focus on ensuring available resource is used efficiently. Just two of existing objectives fall into this category – water allocation (section 3.12) and use of coastal space.

I have inserted a number of sub headings to make the rationale for the proposed clustering more apparent. Similarly, I have included “titles” for each objective. Those are inserted for ease of reference in the table.

As with any framework there are arguments at the margin that certain objectives might be better located under a different heading. That is inevitable and in some cases given existing wording I agree that there are some fine lines. I have simply made a suggestions based on what seems most logical and internally consistent.

Table 1 includes all objectives from the PNRP. It does not make any suggestions for amalgamating or amending objectives (although opportunities to do so have become more readily apparent). I discuss those issues in the following sections.

Table 1 – Clustering of objectives

<b>How resources will be managed</b>	
<b>Integration</b>	Objective O1 – Mountains to the sea
<b>Beneficial use recognised</b>	Objective O2 – Social, economic and cultural wellbeing Objective O8 - Social, economic and cultural benefits of taking water Objective O12 – Benefits of infrastructure and renewable energy Objective O11 – Maori customary use
<b>Maori relationships recognised</b>	Objective O14 – Maori Relationships Objective O15 - Kaitiakitanga Objective O16 – Mana whenua
<b>Outcomes sought from management</b>	
<b>Use and development of resources for people’s well-being</b>	Objective O6 – Water for health needs Objective O7 – Water for livestock Objective O9 – Recreational values Objective O10 – Public access Objective O13 – Ongoing operation of infrastructure and renewable energy Objective O26 – Mahinga kai/customary use Objective O59 – Safe passage of vessels
<b>Managing for environmental values</b>	<b><i>Cross-cutting outcomes (outcomes sought across the environment)</i></b> Objective O2 – Intrinsic values* Objective O3 – Mauri* Objective O17 - Natural character Objective O19 - Natural processes <b><i>Water, water bodies and aquatic ecosystems</i></b> Objective O23 – Water quality maintained Objective O5 – Key values of waterbodies: (narrative outcomes) Objective O24 – Water quality suitability for recreational and customary use (numeric outcomes) Objective O25 – Water body outcomes for ecosystem health/mahinga kai (numeric

	<p>outcomes)</p> <p>Objective O27 – Riparian margins</p> <p>Objective O28 – Natural wetlands</p> <p>Objective O29 – Fish passage</p> <p><b>Coastal marine area</b></p> <p>Objective O53 – Functional need</p> <p>Objective O55 – Open space in the CMA</p> <p>Objective O56 – Scale, density and design of development</p> <p>Objective O57 – Lambton Harbour</p> <p><b>Air</b></p> <p>Objective O39 – Ambient air quality</p> <p><b>Soil</b></p> <p>Objective O42 – Soil health and productivity</p>
<p><b>Managing specific risks to land, water, air, the coast and people</b></p>	<p><b>Risks from point source and non point source discharges</b></p> <p>Objective O40 – Point source discharges of air pollutants</p> <p>Objective O41 – Effect of smoke, odour and dust on amenity values</p> <p>Objective O43 – Contaminated Land</p> <p>Objective O44 – Land use activities</p> <p>Objective O45 – Livestock access</p> <p>Objective O46 – Discharges to land</p> <p>Objective O47 – Sediment run-off</p> <p>Objective O48 – Stormwater and urban uses</p> <p>Objective O49 – Wastewater to land</p> <p>Objective O50 – Wastewater to freshwater</p> <p>Objective O51 – Hazardous substances</p> <p>Objective O58 – Noise in the CMA</p> <p><b>Risks from hazards and climate</b></p> <p>Objective O20 – Risk and residual risk</p> <p>Objective O21 – High hazard areas</p> <p>Objective O22 – Hard engineering responses</p>
<p><b>Managing places and sites with special values</b></p>	<p>Objective O31 – Outstanding water bodies</p> <p>Objective O32 – Outstanding natural features</p> <p>Objective O33 – Significant mana whenua</p> <p>Objective O34 – Significant historic heritage</p>

	Objective O35 – Significant biodiversity Objective O36 – Significant geological features Objective O37 – Significant surf breaks Objective O38 – Special amenity landscapes Objective O30 – Habitat of trout Objective O18 - Estuaries
<b>Efficient use of resources</b>	Objective O52 – Water allocation
	Objective O54 – Occupied coastal space

\* Both intrinsic values and mauri could equally be located within the “how resources will be managed” section

### 2.3 Are all the groups of objectives necessary?

As a second inquiry I have considered whether all the groups or types of objectives are strictly necessary (i.e. whether there is an opportunity to streamline the objectives framework). In particular I have considered:

- objectives that target specific threats; and
- objectives that address how outcomes will be achieved.

#### 2.3.1 Objectives targeting specific threats

Objectives such as O58 might be argued to be unnecessary since a general objective (in this case “*to maintain the health and wellbeing of marine fauna and the health and amenity values of users*”) would suffice as the foundation for policies targeting specific pressures/threats (in this case noise). However, while arguably unnecessary I do not consider it to be inappropriate or in any way problematic.

A number of other objectives fall into this same category. In fact there is an argument that all the objectives that focus on particular specific *activities* (particularly the discharge objectives of section 3.11) may not be strictly necessary on the basis that controlling discharges is a *means to an end*, rather than an end in itself. Hence it is questionable whether activity-specific objectives (Objectives O44-O51) are required. Discharges (and other activities) could be addressed solely at the level of policy. In my opinion activity-specific objectives could be deleted without losing any functionality in the plan.

As noted above, while I believe that is a valid approach to adopt I do not consider it the only valid approach to take. Accordingly, I have not suggested the deletion of the activity/discharge-specific objectives in the alternative framework outlined earlier nor that suggested in Appendix B).

#### 2.3.2 Objectives including the “how”

A number of objectives include not only the outcome to be achieved but also the *means* by which they are to be achieved. An example is Objective 52. That objective refers quite reasonably to the outcome being improvement and maximisation of the efficiency of allocation and use of water. However, it goes on to specify *how* that is to be achieved (efficient infrastructure, good management practice, enabling transfers and storage etc). Those means of achieving the outcome are then individually reflected in, for example, policies P118, P119, P120, P128.

Again, there is certainly an argument that extending the objective in that way is unnecessary (and perhaps more wordy than strictly necessary), although it might be

an overly severe judgment to suggest it is inappropriate or problematic - provided there is no conflict with the policies<sup>7</sup>.

### 2.3.3 Objectives that “recognise”

Objectives O2, O4, O12, O15 and O55 all focus on “recognising” some particular matter (value or relationship). Objectives, O8, O11, O14 and O16 similarly focus on “recognising and providing for”.

As discussed earlier, these objectives are not in themselves problematic provided the plan recognises the limited utility of such objectives for decision-making and includes sufficient additional objectives of a type that can provide greater decision-making guidance. Accordingly, I do not consider them necessary but have suggested that they form a separate class of objective.

### 2.3.4 Objectives with imprecise outcomes

Several of the objectives use the terms “restored” or “improved” or similar non-numerically defined adjective. I will not comment on this point in detail but will note that it is probably regarded as good practice to relate such narrative goals to numerically defined outcomes wherever possible. It is sometimes possible to do so (at least for various aspects of water quality and quantity where there are numerically defined targets). In other instances the information is not available to allow numeric outcomes to be formulated and the objective is simply to do better than previously or as much as practicable. There is often concern that where numeric outcomes are not defined, narrative objectives to “reduce” for example may be applied overly rigorously in a consenting context allowing no new activities to establish and/or even very low impact /highly efficient activities to reduce discharges when that might be quite unreasonable in the circumstances.

In my opinion, objectives cannot be looked at in isolation from the policies that are designed to implement them. If the relevant policy provides for a more nuanced consideration then the objective needs to be applied in that light. However, such imprecise wording can be problematic when it is replicated by the applicable policy. I have not reviewed the policies and hence I am unable to comment on whether this issue is likely to be a legitimate concern in this instance.

## 2.4 Section 2 conclusion

Whether or not the framework proposed above is adopted in the PNRP, it has been a useful exercise to attempt to group the existing objectives according to a different framework. Just knowing that there is a coherent rationale for the suite of objectives (even if the presentation of the objectives does not currently make that readily apparent) may satisfy some concerns.

Certainly, there are many other ways such re-clustering could be carried out. As noted earlier, the option put forward is an attempt to achieve greater visible coherency/rationale without the need for widespread reworking of the objectives themselves. In other words, it demonstrates that if the Hearings Panel so desires, the bulk of the objectives can be retained (subject to tuning wording and other miscellaneous amendments discussed elsewhere in this report).

However, the framework admittedly remains complex and arguably not easily navigable by the layperson. It also contains objectives of a type and nature that may not be strictly necessary if there is an underlying desire to streamline the framework.

A simpler framework would be one that groups objectives by resource and by value. I discuss that in section 4.

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<sup>7</sup> I have not comprehensively reviewed the objectives for consistency with the policies so I am unable to comment on that.

### 3 Identifying linkages and the need for any deletion

Section 2 outlined linkages in objectives in terms of common themes and the coherency of groupings.

This section considers the specific linkages between objectives and whether there is opportunity to delete some specific objectives.

Ideally, a wiring diagram would explain the relationship and linkages between individual objectives and assist in identifying areas of overlap.

In reality such a wiring diagram would be something of a “birds nest” given the interconnections that exist. To keep the task manageable I have focused in Figure 1 on the linkages between water quality, water quantity and aquatic ecosystem health and mahinga kai<sup>8</sup>.

Figure 1 shows that even taking a partial view of the suite of objectives the linkages are complex. It is difficult to identify a clear hierarchy. Many objectives both contribute to one or more other objectives and have a value and purpose in their own right. Having pondered the ability to prepare wiring diagrams and other graphic illustrations of linkages I concluded that they would more probably add to, rather than resolve complexity.

At a more pragmatic level I can see opportunities to rationalise the number of objectives. I have identified the following opportunities. (Note, wording suggestions are indicative only and require further consideration).

#### 3.1 Social, economic and cultural well-being (Objectives O2 and O8)

In my opinion Objective O8 could be deleted or combined with Objective O2 (to make that Objective O2 relates to water allocation). That might mean a single Objective as follows:

O2 The importance and contribution of land and water to the social, economic and cultural well-being of the community are recognised in the management and (where applicable) allocation of those resources

~~O8 The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework~~

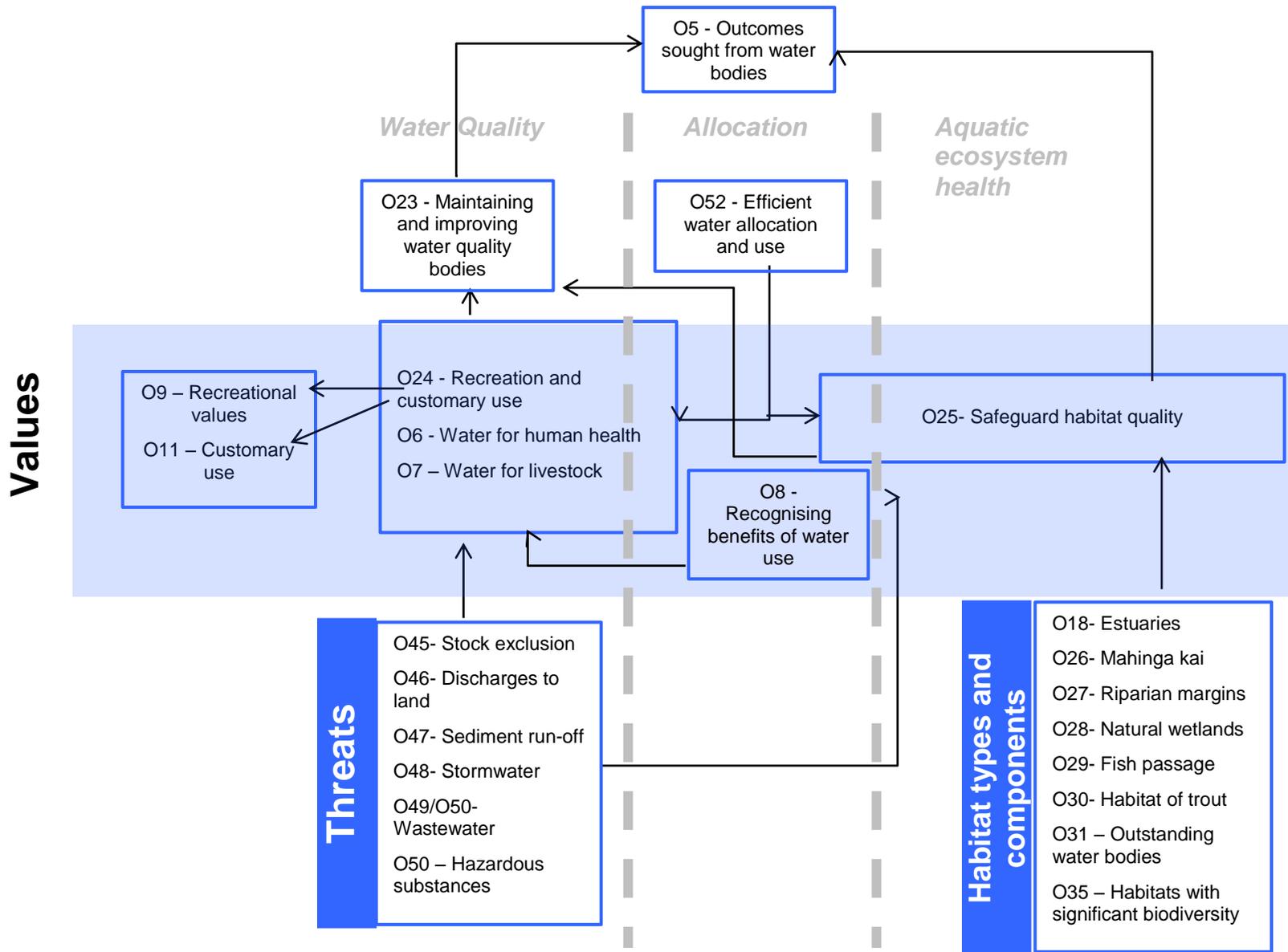
#### 3.2 Outcomes from freshwater management (Objectives O5 and O25)

As noted by the Panel, there appears to be duplication between Objectives O5 and O25.

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<sup>8</sup> An alternative pictorial depiction of the water/aquatic ecosystem objective relationships is included as Appendix C

Figure 1 – Relationship of water objectives



There is a case that all the water quality-related objectives need to be considered together and I review them as follows.

- Objective O5 sets out the bottom line values/outcomes to be achieved in freshwater bodies and the CMA in purely narrative terms (being (a) ecosystem health & mahinga kai, (b) customary use and (c) human health). Importantly, it is not limited to water *quality* but presumably applies more broadly to managing the physical components of water bodies (beds and margins) along with the occupation of space (at least in the case of the CMA) as well as water *quantity* (flows and levels).
- Objective O25, discusses in more detail (by reference to numeric standards) the outcomes to be sought in respect of only the first of the matters addressed by Objective O5 (ecosystem health and mahinga kai). In that sense Objective O25 elaborates on and provides greater detail on *part* of Objective O5. Its scope is broader than water quality and hence it does not appear in the water quality section.
- Objective O24 elaborates on and gives greater detail about the balance of Objective O5 (parts (b) and (c)). Objective O24 is only relevant to *water quality*.
- Objective O23 establishes the overall objective for the quality of water in freshwater bodies (including groundwater) and in the CMA being that such water be maintained or improved.

Of some note the terminology used across the objectives varies between talking about “freshwater bodies” (O5 and O25); “rivers, lakes, natural wetlands and groundwater” (O23); and “rivers, lakes and natural wetlands” (O24).

Having considered those four objectives in some detail and the various dimensions and sub issues addressed, I do acknowledge that they are distinct. I do, however, consider that there is some opportunity to rationalise those four objectives into just two – one relating to water quality the other relating to aquatic ecosystem health.

That might be achieved as follows.

#### **Objective O5 (Water Quality)**

**The quality of water in fresh water bodies and the coastal marine area, as a minimum is managed to:**

**(a) safeguard aquatic ecosystem health and mahinga kai by improving water quality over time to meet the objectives of Tables 3.4, 3.5, 3.6, 3.7 or 3.8 where those objectives are not already met; and**

**(b) provide for human health, contact recreation and Maori customary use by improving water quality in:**

**(i) significant contact recreation fresh water bodies to meet, as a minimum, the primary contact recreation objectives in Table 3.1, and**

**(ii) coastal water to meet, as a minimum, the primary contact recreation objectives in Table 3.3, and**

**(iii) all other rivers and lakes and natural wetlands to meet, as a minimum, the secondary contact recreation objectives in Table 3.2.**

**(c) except as provided in (a) and (b) above, be maintained.**

### **Objective O25 (Aquatic Ecosystem Health)**

**Aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded by:**

- (a) water quality, flows, water levels and aquatic and coastal habitats that maintain aquatic ecosystem health and mahinga kai values, and
- (b) encouragement of restoration of aquatic ecosystem health and mahinga kai, and
- (c) compliance with water quality Objective O5(a)

### **3.3 Recreational values and Maori customary use**

Recreational values are addressed in Objective O9 and Maori customary use by Objective O11. These values are also addressed in Objective 24.

Objective 24, however, only deals with the water quality dimension of suitability for the uses specified. Under the proposal outlined above that focus on water quality is retained. In my opinion, Objectives O9 and O11 could be combined and refocused on the non water quality aspects of the CMA, rivers, lakes and wetlands that need to be maintained or enhanced to protect to two values specified.

### **3.4 Significant infrastructure and renewable energy generation**

Objectives O12 and O13 both address significant infrastructure and renewable energy generation. Objective O12 simply seeks “to recognise” while O13 seeks protection of those activities in the CMA from incompatible uses. Again, there seems to be an obvious opportunity to combine these two quite specific objectives.

A combined objective might read:

The social, economic, cultural and environment benefits of regionally significant infrastructure and renewable energy generation activities are recognised and the use and development of such infrastructure or activity in the coastal marine area is protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity

### **3.5 Estuaries - Objective O18**

Objective O18 focuses on the ecological, recreational, mana whenua and amenity values of estuaries. Estuaries are obviously part of the CMA hence Objectives O9 (recreational values), O16 (mana whenua) and O25 (aquatic ecosystem health) all apply to estuaries regardless of Objective O18. It is not clear to me why estuaries are singled out over other environments within the CMA. Unless there is a clear (but currently unstated) reason for highlighting estuaries at the objective level, the need to retain Objective O18 is not strong.

### **3.6 Objectives O26 to O30**

Objectives O26 to O30 address aspects of ecosystem health. Given the redrafting suggested for Objective O25 there is an opportunity to add these matters (with minor rewording as required) as items (d) to (h) of Policy 25 as proposed in section 3.2 above.

### 3.7 Land use objectives

Objective O44 may be dispensed with on the basis that Objective O42 provides the foundation for policies on land use as it affects soil and Objective O23/O24 provides the foundation for policies on land use as it affects water.

A similar argument may be made for Objective O45. In that case, there may be some expectation that the objectives should refer to the high profile issue of stock access to waterways. In that case, limiting stock access might be listed as matter (i) under Objective O25.

There is no corresponding section on land use policies in Chapter 4 of the PNRP, hence deletion of this section from Chapter 3 has some logic.

## 4 Objectives or policies?

The final question asked by the ToR is whether any of the objectives might be best referred to as policies.

### 4.1 The test of an objective

Whether any of the existing “objectives” might be better characterised as policies depends on the test applied. Admittedly this is a grey area but in broad terms, if an existing objective is not something sought for its own sake but because it is a prerequisite to achieving another objective, then it may be better described as a policy. However, that test cannot be strictly applied. It is important to distinguish between a provision that *contributes* to a broader outcome and one which *implements a course of action* towards the achievement of that outcome. As already stated, objectives can be “nested” so that one specific outcome contributes to a broader outcome. The distinguishing feature of a true objective is that the outcome at its heart will be one recognised by the Act, national policy or RPS as an outcome in its own right (so that it has value and relevance independent of any higher order objective to which it might contribute). Also relevant to consider is the question of whether the objective provides a critical foundation for policies that would not exist in the absence of that objective.

### 4.2 Applying the test

Applying those tests to the 59 objectives I have identified just four objectives of Chapter 3 that might be better described as policies. Those objectives are:

- Objective O22. The objective states that hard engineering mitigation is only used as a last resort. In my opinion Objective O22 is a policy rather than an objective. The question immediately raised by the objective is “why?” The objective provides no context to Policies P28 and 139. Is it because hard engineering options are not effective long term or because they tend to compromise natural character? Or is there some other outcome at risk by such measures? The objective ought to be focused on what it is that is sought to be protected or avoided by not using hard engineering mitigation methods. (As an aside, I note also that the objective does not state the context in which it is to apply. That is, is the policy only intended to apply to coastal hazard mitigation or does it apply more broadly to non-natural hazard issues?)
- Objective O43. The objective refers to how contaminated land is to be managed and hence reads more like a policy. Minor rewording as follows (or similar) would provide a remedy.

Contaminated land ~~is managed to~~ does not present an unacceptable risk to protect human health and the environment

- *Objective O53.* The objective refers to activities in the CMA having a functional need or operational requirement to be there. In my opinion that is a policy. It aims to achieve something else – presumably a low level of development in the CMA – other than simply activities having a functional need for their own sake. In other words, it is not an outcome that has relevance in its own right. The objective appears to contribute to an underlying objective for low development density and an open and undeveloped character for the CMA. (It may be that it is intended to contribute to Objective O55).
- *Objective O57.* The objective refers very specifically to the compatibility of development in Lambton Harbour Area. It appears designed to provide the foundation for Policy P142. The wording of the objective is, however, largely a summary of the policy. In my view, Objective O57 could be retained as an objective but requires minor rewording. For example it might read:

*Use and development ~~is appropriate~~ in the Lambton Harbour Area is ~~when it is~~ compatible with its surroundings and the Central Area of Wellington City*

In addition, however, I reiterate the point made earlier that activity-specific objectives that add nothing to the policies that implement them could be regarded as policies themselves and be dispensed with. That is, admittedly, largely a matter of style rather than substance.

For completeness I include as Appendix B a table that proposes a structure for Chapter 3 that reflects the changes suggested above and presents the more simplified and “striped down” approach that I have indicated is possible (albeit not necessary).

## 5 Conclusion

The concern with the suite of 59 objectives of the PNRP is understandable in the sense that at first glance the objectives are not organised to clearly relate to the RPS or to the structure of the policies that follow in the PNRP (although they are more closely related to the latter). The framework used to organise the objectives is not obvious and some issues appear fragmented in how they are addressed.

However, on closer inspection it is clear to me that the objectives can be rationalised and it may well be that some reorganisation and new and additional headings would assist the reader to understand the logic.

That said there are certainly opportunities to reword and/or combine some objectives to remove minor duplication. Additionally, some objectives might be dispensed with (or reworded) to ensure they comply with commonly applied rules for specifying and phrasing of objectives.

APPENDIX A - Legal foundation for objectives as notified

Objective	Direct RMA Part 2 foundation	Direct NPS foundation*	Indirect RMA Part 2/NPS foundation or foundation in part	Other national instrument or legislation	RPS linkage
<b>3.1 Mountains to the Sea</b>					
<p>Objective O1</p> <p>Land, freshwater bodies and the coast are managed as integrated and connected resources; ki uta ki tai – mountains to the sea</p>		NPSFM Objective C1		RMA s.30(1)(a)	<p>Many references in explanations and arguably inherent in combined coastal/land/water structure of PNRP</p> <p><i>Objective 25</i></p> <p><i>Policy 64</i></p>
<p>Objective O2</p> <p>The importance and contribution of land and water to the social, economic and cultural well being of the community are recognised</p>	The enablement of resource use inherent in Section 5(2)				<i>Objective 12(a)</i>
<p>Objective O3</p> <p>Mauri is sustained and enhanced, particularly the mauri of fresh and coastal waters</p>			Compulsory national values Appendix 1 NPSFM		<p>Objective 26</p> <p>Policy 49</p>
<p>Objective O4</p> <p>The intrinsic values of aquatic fresh water and marine ecosystems are the life-supporting capacity of water are</p>	Section 5(2) (b), Section 7 (d)				<i>Objectives 3, 4, 6, 12, 13</i>

recognised			
<p><b>Objective O5</b></p> <p>Freshwater bodies and the coastal marine area, as a minimum, are managed to:</p> <p>(a) safeguard aquatic ecosystem health and mahinga kai, and</p> <p>(b) provided for contact recreation and Maori customary use, and</p> <p>(c) in the case of freshwater provide for the health needs of people</p>		<p>NPSFM Objective A1 &amp; compulsory value Appendix 1</p> <p>NZCPS Objective 1</p>	<p>Objectives 3, 4, 6, 12, 13, 27</p> <p>(Policies 5, 18, 35, 40, 49)</p>
<b>3.2 Beneficial use and development</b>			
<p><b>Objective O6</b></p> <p>Sufficient water of a suitable quality is available for the health needs of people</p>		<p>Compulsory national values Appendix 1 NPSFM</p>	<p>Objective 12(a)</p> <p>(Policy 17)</p>
<p><b>Objective O7</b></p> <p>Freshwater is available in quantities and is of a suitable quality for the reasonable needs of livestock</p>		<p>Compulsory national values Appendix 1 NPSFM</p>	<p>Objective 12(a)</p>
<p><b>Objective O8</b></p> <p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework</p>	<p>The enablement of resource use inherent in Section 5(2)</p>		<p>Objective 12(a)</p>
<p><b>Objective O9</b></p> <p>The recreational values of the coastal marine area, rivers and lakes and their margins and natural wetlands are</p>		<p>NZCPS Objective 4</p>	<p>Objective 3, 12(a)</p>

maintained and enhanced			
<b>Objective O10</b> Public access to and along the coastal marine area and rivers and lakes is maintained and enhanced		<b>NZCPS Objective 4</b>	<b>Objective 8</b> (Policy 53)
<b>Objective O11</b> Opportunities for Maori customary use of the coastal marine area, rivers and lakes and their margins and natural wetlands for cultural purposes are recognised, maintained and improved		<b>Compulsory national values Appendix 1 NPSFM</b>	<b>Objective 27</b> (Policy 49)
<b>Objective O12</b> The social economic, cultural and environmental benefits of regionally significant infrastructure and renewable energy generation activities are recognised		<b>NPSRE Objective (and Policy A)</b>	<b>Objective 10</b> (Policy 7, 8 & 39)
<b>Objective O13</b> The use and ongoing operation of regionally significant infrastructure and renewable energy generation activities in the coastal marine area are protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.		<b>NZCPS Objective 6</b> <b>NPSRE Objective (and Policy A and E1)</b>	<b>Objectives 9 &amp; 10</b> (Policy 7, 8 & 39)
<b>3.3 Maori Relationships</b>			
<b>Objective O14</b> Maori relationships with air, land and water are recognised, maintained and improved.	<b>Section 6 (e)</b>		<b>Objectives 28</b> (Policies 24 & 49)

<p><b>Objective O15</b></p> <p>Kaitiakitanga is recognised and manawhenua actively participate in planning and decision-making</p>	<p><b>Section 7 (a)</b></p>			<p>Objectives 23, 24 &amp; 25</p> <p>(Policies 48, 49 &amp; 66)</p>
<p><b>Objective O16</b></p> <p>The relationship of manawhenua with Nga Taonga Nui a Kiwa is recognised and provided for</p>	<p><b>Section 6 (e)</b></p>	<p><b>NZCPS Objective 3</b></p>	<p>Statutory Acknowledgements from:</p> <ul style="list-style-type: none"> <li>• the Port Nicholson Block (Taranaki Whanui ki Te Upoko o Te Ika) Claims Settlement Act 2009</li> <li>• Ngati Toa Rangatira Claims Settlement Act 2014</li> </ul>	<p>Objective 28 (Policy 49)</p>
<p><b>3.4 Natural character, form and function</b></p>				
<p><b>Objective O17</b></p> <p>The natural character of the coastal marine area, rivers, lakes and their margins and natural wetlands is preserved and protected from inappropriate use and development</p>	<p><b>Section 6 (a)</b></p>	<p><b>NZCPS Objective 2</b></p>	<p>Objectives 4 &amp; 13</p>	
<p><b>Objective O18</b></p> <p>The ecological, recreation, mana whenua, and amenity values of estuaries including their sensitivity as low energy receiving environments are recognised, and their health and function is restored over time.</p>	<p><b>NZCPS Objective 1</b></p>		<p><b>Section 6 (a)</b></p>	<p>Objectives 3, 4, 5, 6, &amp; 7</p> <p>(Policies 5, 6, 24 &amp; 37)</p>
<p><b>Objective O19</b></p> <p>The interference from use and</p>	<p><b>Section 6 (e)</b></p>			<p>Objective 7</p>

development on natural processes is minimised				
<b>Objective O20</b> The risk, residual risk, and adverse effects from natural hazards and climate change on people, the community and infrastructure are acceptable	Section 6 (h)	NZCPS Objective 5		Objective 19 & 21 (Policy 51)
<b>Objective O21</b> Inappropriate use and development in high hazard area is avoided	Section 6 (h)	NZCPS Objective 5		Objectives 19 & 21 (Policy 29)
<b>Objective O22</b> Hard engineering mitigation and protection methods are only used as a last practicable option		NZCPS Policy 25		Objective 20 (Policy 52)
<b>3.5 Water Quality</b>				
<b>Objective O23</b> The quality of water in the region's rivers, lakes, natural wetlands, groundwater and the coastal marine area is maintained or improved		NPSFM Objective A2	Section 5 (2)(b)	Objective 12 (Policy 12)
<b>Objective O24</b> Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Maori customary use, including by: (a) maintaining water quality, or (b) improving water quality in: (i) significant contact recreation			NPSFM Objective A1	Objective 12 (Policy 12)

<p>freshwater bodies to meet, as a minimum, the primary contact recreation objectives in Table 3.1, and</p> <p>(ii) coastal water, as a minimum, the primary contact recreation objectives in Table 3.3, and</p> <p>(iii) all other rivers and lakes and natural wetlands to meet, as a minimum, the secondary contact recreation objectives in Table 3.2</p>			
<b>3.6 Biodiversity, aquatic ecosystem health and mahinga kai</b>			
<p><b>Objective O25</b></p> <p>To safeguard aquatic ecosystem health and mahinga kai in freshwater bodies and coastal marine area:</p> <p>(a) water quality, flows, water levels and aquatic and coastal habitats are managed to maintain aquatic ecosystem health and mahinga kai, and</p> <p>(b) restoration of aquatic ecosystem health and mahinga kai is encouraged, and</p> <p>(c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is improved over time to meet that objective</p>	<p><b>NPSFM Objectives A1 and B1</b></p>		<p>Objective 12,13, 27 &amp; 28</p> <p>(Policies 12, 18, 43 &amp; 49)</p>
<p><b>Objective O26</b></p> <p>The availability of mahinga kai species to support customary harvest is increased, in quantity, quality and diversity</p>	<p><b>Section 6 (e)</b></p> <p><b>NZCPS Objective 3</b></p>		<p>Objective 27</p>

Objective O27 Vegetated riparian margins are established and maintained	NZCPS Policy 14	Objective 13 (Policy 43h)
Objective O28 The extent of wetlands is maintained or increased and their condition is restored	NPSFM Objective A2 b)	Objectives 3, 7, 12, 13, 17
Objective O29 Use and development provides for the passage of fish and koura, and the passage of indigenous fish and koura is restored		Objective 13 (Policy 18, 43g)
Objective O30 The habitat of trout identified in Schedule I (trout habitat) is maintained and improved	Section 7 (h)	Objective 12
<b>3.7 Sites with significant values</b>		
Objective O31 Outstanding water bodies and their significant values are protected.	NPSFM Objective A2	Objective 17 (Policy 25)
Objective O32 Outstanding natural features and landscapes are protected from inappropriate use and development	Section 6 (b)	Objectives 3 & 17. (Policy 26)
Objective O33 Sites with significant mana whenua values are protected and restored	Section 6 (e)	Objectives 3 & 28

Objective O34 Significant historic heritage values are protected and restored	Section 6 (f)	Objectives 3 & 15 (Policies 21, 22 and 46)
Objective O35 Ecosystems and habitats with significant indigenous biodiversity values are protected and restored	Section 6 (c)	Objectives 3 & 16 (Policies 23, 24 and 47)
Objective O36 Significant geological features in the coastal marine area are protected	Section 6 (a) NZCPS Objective 2	Objectives 3, 4 & 17 Policy 3, 25 & 35g
Objective O37 Significant surf breaks are protected from inappropriate use and development	NZCPS Policy 16	Objectives 3, 4 & 7
Objective O38 Identified special amenity landscape values are maintained or enhanced	Section 7 (c)	Objective 18 Policies 27 & 28
<b>3.8 Air</b>		
Objective O39 Ambient air quality is maintained or improved to the acceptable category or better in Schedule L1 (ambient air)		Resource Management (National Environmental Standards for Air Quality) Regulations 2004
Objective O40 Human Health, property, and the environment are protected from the adverse effects of points source discharges of air pollutants	Section 5(2) (b)	Objectives 1 & 2, (Policy 2)

<p><b>Objective O41</b></p> <p>The adverse effects of odour, smoke and dust on amenity values and people's well-being are reduced</p>	<p>Section 7 (c)</p>		
<p><b>3.9 Soil</b></p>			
<p><b>Objective O42</b></p> <p>Soils are healthy and productive, and accelerated soil erosion is reduced</p>	<p>Section 5 (2) Section 7 (f)</p>		<p>Objectives 29 and 30 (Policies 15, 41, 68)</p>
<p><b>Objective O43</b></p> <p>Contaminated land is managed to protect human health and the environment</p>			<p>Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 Policy 34</p>
<p><b>3.10 Land use</b></p>			
<p><b>Objective O44</b></p> <p>The adverse effects on soil and water from land use activities are minimised</p>			<p>RMA section 30(3) Objectives 29 &amp; 30 (Policy 69)</p>
<p><b>Objective O45</b></p> <p>The adverse effects of livestock access on surface water bodies are reduced</p>			<p>Objective 13 Policies 18(f) &amp; 43(i)</p>
<p><b>3.11 Discharges</b></p>			
<p><b>Objective O46</b></p> <p>Discharges to land are managed to reduce the runoff or leaching of</p>			<p>Objective 12 (Policy 35a)</p>

contaminants to water			
Objective O47 The amount of sediment-laden run-off entering water is reduced			Objective 12 (Policy 15)
Objective O48 Stormwater networks and urban land uses are managed so that the adverse quality and quantity effects or discharges from the networks are improved over time			Objective 12 (Policy 14)
Objective O49 Discharges of wastewater to land are promoted over discharges to freshwater and coastal water			Objective 12 (Policy 16)
Objective O50 Discharges of wastewater to fresh water are progressively reduced			Objective 12 (Policy 16)
Objective O51 The discharge of hazardous substances is managed to protect human health			Objective 12
<b>3.12 Water allocation</b>			
Objective O52 The efficiency of allocation and use of water is improved and maximised through time, including by means of:  (a) efficient infrastructure, and (b) good management practice,	Section 7 (b)	NPSFM Objective B3	Objective 14 (Policies 20, 44, 45, 65)

including irrigation, domestic municipal and industry practices, and

(c) maximising reuse, recovering and recycling of water and contaminants' and

(d) enabling water to be transferred between users, and

(e) enabling water storage outside river beds

### 3.13 Coastal Management

<p><b>Objective O53</b></p> <p>Use and development in the coastal marine area has a functional need or operational requirement to be located there</p>	<p>NZCPS Policy 6(2) (c)&amp;(d)</p>	<p><i>Objective 4 (Policy 36)</i></p>
<p><b>Objective O54</b></p> <p>Use and development makes efficient use of any occupied space in the coastal marine area</p>	<p>NZCPS Policy 6(2)(e)</p>	<p><i>Objectives 3 &amp; 4 (Policy 35, 36, 37)</i></p>
<p><b>Objective O55</b></p> <p>The need for open space in the coastal marine area is recognised</p>	<p>NZCPS Objective 4</p>	<p><i>Objectives 3 &amp; 4 (Policy 35c)</i></p>
<p><b>Objective O56</b></p> <p>New development in the coastal marine area is of a scale, density and design that is compatible with its location in the coastal environment</p>		<p><i>Objectives 3 &amp; 4 (Policy 35, 36,37)</i></p>
<p><b>Objective O57</b></p> <p>Use and development is appropriate in the Lambton Harbour Area when it is</p>		<p><i>Objective 22</i></p>

compatible with its surroundings and the Central Area of Wellington City	
<p><b>Objective O58</b></p> <p>Noise, including underwater noise, from activities in the coastal marine area is managed to maintain the health and well-being of marine fauna, and the health and amenity value of users of the coastal marine area</p>	<p><i>Objectives 3 &amp; 4</i> <i>(Policy 35, 36, 37)</i></p>
<p><b>Objective O59</b></p> <p>The efficient and safe passage of vessels and aircraft that support the movement of people goods and services is provided for the in coastal marine area</p>	<p>NZCPS Policy 9</p> <p>-</p>

**\*Notes:**

- The “Indirect” column is not comprehensively completed and entries generally only made in this column if there is no direct RMA or NPS foundation.
- The NPS foundation for an objective is considered to be in the *objectives* of any NPS. NPS *policy* foundation is only specified in this table where no direct foundation is found in the objectives of the applicable NPS (in the case of the NPSRE the policy is noted as that instrument contains only a single high level objective)
- National environmental standards are specified as foundations to the extent that they require provisions to be included in the methods of plans that require a foundation in the objectives and policies.
- The RPS linkage references relate to the most direct and obvious objective(s) and or policies of the RPS that is being given effect to. It is not intended to be comprehensive. Other RPS provisions might also be argued to be given effect to by the relevant PNRP objective. (Note also that this evaluation has not considered the question as to whether *all* RPS provisions have been given effect to (insofar as is applicable) by the PNRP.
- Text in *grey italics* indicates RPS provisions that might be said to be given effect to by the NRMP objective despite there being no direct reference to terms used in the NRMP objective. (That is, the general concepts promoted appear consistent with the RPS provisions, or would likely contribute towards the referenced RPS policy).

## APPENDIX B – Simplified alternative framework

<b>Resource-focused objectives</b>
<p><b>Integration</b></p> <p>O1</p>
<p><b>Water</b></p> <p>[O5, O23, O24, 25(part) – combined into new O5 as per page 14]                      O46, O47, O48, O49, O50, O51 (discharges),                      O6, O7, O52</p>
<p><b>Aquatic ecosystems</b></p> <p>O4                      [25 – as revised as per page 14 combined with O26, O27, O28, O29, O30 &amp; O45]                      O35</p>
<p><b>Soil</b></p> <p>O42, O43 (revised as per page 16)</p>
<p><b>Air</b></p> <p>O39, O40, O41</p>
<p><b>The coast</b></p> <p>O54, O55, O56, O57 (revised as per page 17), O58, O59</p>
<b>Values-focused objectives</b>
<p><b>Natural character and natural processes</b></p> <p>O17, O18, O19, O20, O21, O32, O33, O36, O37, O38</p>
<p><b>Maori values and relationships</b></p> <p>O3, O11, O14, O15, O16, O33</p>
<p><b>Resource use, infrastructure and renewable energy</b></p> <p>[O2 &amp; O8 combined], [O12 &amp; O13 combined]</p>
<p><b>Recreation and public access</b></p> <p>O9, O10</p>

Notes:

- Objectives O22, O44 and O53 are deleted entirely.
- Objectives shown in grey font are considered non-essential

## APPENDIX C - Relationships - Water Management

