

Regional Policy Statement for the Wellington Region, Variation 1

Summary of Decisions requested - Ordered by Provision

Provision:
Overall variation
New section heading 3.4.A: Long-term freshwater vision
New objective TAP
New objective TWT
New figure 3.4

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S2 DairyNZ	S2.001	Overall variation	Neutral	<p>DairyNZ submits on this variation to ensure the approach to freshwater management in the affected areas is reasonable. In considering the proposed amendments we have assumed there is some potential for the specific wording and overall approach to be applied to rural areas.</p> <p>We acknowledge that only long-term visions for urban catchments have been included in this variation due to the status of the WIP statements and upcoming regulatory processes in the FMU's. Going forward any long-term visions developed for rural whaitua should be done in a way that clarifies if the council intends to include them in an RPS.</p>	Retain as notified.
S3 Wairarapa Province of Federated Farmers	S3.001	Overall variation	Amend	<p>Long-term visions for freshwater are required to be included as objectives in regional policy statements by the National Policy Statement - Freshwater Management 2020 (NPS-FM) clause 3.3(1). We support the inclusion of long-term freshwater visions for Te Awarua-o-Porirua Whaitua and Te Whaitua Whanganui-a-Tara, subject to the recommended changes discussed above and detailed in this table.</p>	N/A
S4 Wellington City Council (WCC)	S4.001	Overall variation	Support	<p>Thank you for the opportunity to make a submission on Variation 1 to Proposed Regional Policy Statement Change 1 for the Wellington Region.</p> <p>Overall, Wellington City Council (WCC) is supportive of the proposed Variation and the visions for freshwater that are seeking to be inserted in the Regional Policy Statement (RPS).</p> <p>Alignment of the RPS and WCC's approach to urban growth and protection of the environment is crucial. The need for freshwater improvements is well known and the intent in the RPS is positive. The freshwater visions</p>	Retain with amendments sought

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				will be challenging to achieve, requiring significant investment by Central Government, Councils and private developers. This is at a time when many Territorial Authorities in the region, including WCC, have funding constraints that limit our opportunity to	
S5 Wellington Fish and Game Council	S5.001	Overall variation	Support	WFGC is supportive of the inclusion of long-term visions for Te Awarua-o-Porirua Whaitua and Te Whaitua Whanganui-a-Tara into the GWRC RPS PC1as required by clause 3.3 of the NPS-FM 2020. WFGC is also supportive of the ecosystem and freshwater health focus of the freshwater visions as stated in this Variation 1.	N/A
S5 Wellington Fish and Game Council	S5.002	Overall variation	Not Stated	<p>However, the lack of consultation during the drafting process with WFGC as statutory managers of the sports fish and game bird resources, and the limited involvement with the wider community in the process (acknowledged in paragraphs 47, 49, and 50 of the Section 32 evaluation report of this Variation 1) raises concerns regarding whether the process of the NPSFM 2020 has been followed correctly, particularly Section 3.2 (b), which requires every regional council to engage with communities and tangata whenua to identify long-term visions, environmental outcomes, and other elements of the NOF.</p> <p>The stating of these long-term visions will go on to inform environmental outcomes and target attribute states in the Natural Resources Plan, and therefore the long-term visions must be achieved through a democratic process involving the wider community.</p> <p>Further to this, the lack of communication with WFGC during the development of this Variation 1 is surprising, as the protections for the habitat of trout and salmon is</p>	N/A

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				<p>enshrined in the Resource Management Act (1991), the Natural and Built Environments Act (2022), and the NPSFM (2020). As a leading advocate for wetland and freshwater habitat with statutory and legislative responsibilities, WFGC should have been involved in this process from the outset. While the acknowledgement of fishing and recreation in these long-term visions is well worded and expressed, it falls short of the mark in acknowledging the requirement to protect the habitat for trout and salmon insofar as this is consistent with protections of the habitats of indigenous freshwater species (Policies 10 and Policies 9 of the NPSFM 2020, respectively).</p> <p>The NPSFM 2020 also states in Appendix 1B (other values that must be considered), that where FMUs or parts thereof have fishing values, attributes associated with this fishing value (for both indigenous and valued introduced freshwater fish) need to be specifically targeted to allow the numbers of fish to be sufficient and suitable for human consumption. This information can only be ascertained in communication between those groups mandated to manage these resources and treasures, including Regional Council, tangata whenua/mana whenua, Fish and Game, and the Department of Conservation.</p>	
S6 The New Zealand Transport Agency (NZTA)	S6.001	Overall variation	Support	Waka Kotahi is supportive of the intent of the Variation, including the visions proposed for Te Awarua-o-Porirua Whaitua and Te Whaitua Whanganui-a-Tara.	N/A
S7 Winstone	S7.001	Overall variation	Neutral		N/A

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Aggregates					
S7 Winstone Aggregates	S7.003	Overall variation	Not Stated	While the Section 32 Evaluation states that the visions have been based on statements provided in the Waitua Implementation Plan for each Waitua, there has been limited engagement with communities and tangata whenua on the visions themselves . Most notably, Taranaki Whānui, being one of the two mana whenua over the Waitua which the visions apply to, were unable to meaningfully engage in providing feedback due to the time constraints	Further consideration is given to whether Clause 3.3(3) of the NPS-FM has been met.
S1 Director-General of Conservation (DOC)	S1.001	New section heading 3.4.A: Long-term freshwater vision	Support	This is a structural change required to enable the insertion of new visions as supported below.	Retain as notified.
S3 Wairarapa Province of Federated Farmers	S3.002	New section heading 3.4.A: Long-term freshwater vision	Support	No changes suggested.	N/A
S1 Director-General of Conservation (DOC)	S1.002	New objective TAP	Support	Support. The proposed long-term freshwater vision appropriately gives effect to the National Policy Statement for Freshwater Management 2020 and Te Mana o te Wai.	Retain as notified.
S2 DairyNZ	S2.002	New objective TAP	Support	The timeframe included in the vision sets a clear, ambitious but reasonable timeframe of 2100. As noted in the s32 report accompanying this variation, delivering on the environmental outcomes proposed will impose	Retain as notified.

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				significant costs. DairyNZ agrees that providing for reasonable timeframes to achieve the stated objectives is an important way to mitigate these costs and provide for an effective transition.	
S2 DairyNZ	S2.003	New objective TAP	Oppose	<p>An amendment to 'freshwater and coastal waterbodies' would make the provision more concise.</p> <p>The RMA definition of waterbody "water body means fresh water or geothermal water in a river, lake, stream, pond, wetland, or aquifer, or any part thereof, that is not located within the coastal marine area." This makes listing specific items unnecessary.</p> <p>Given the objective is geographically focused, it is important the objective refers to connected waterbodies.</p>	Amend as follows: "By the year 2100 Te Awarua-o-Porirua connected harbour, awa, wetlands, groundwater, estuaries and coast are <u>freshwater & coastal waterbodies are</u> , healthy, wai ora, accessible, sustainable for future generations, and..."
S2 DairyNZ	S2.004	New objective TAP	Amend	This amendment would clarify that access to waterbodies is provided for when appropriate e.g. not required during storm event or swimming is not provided for during winter and high flows. Further, it is important the objective recognises safe access may not always be possible, particularly where that access occurs across private land, and the use of that land poses a risk to health and safety.	Amend as follows: Provide for the safe access and use of all waterbodies rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of recreational activities including fishing, <u>when appropriate</u> fostering an appreciation of and connection to these waterbodies; and
S2 DairyNZ	S2.005	New objective TAP	Support	The vision statements reflect the hierarchy of Te Mana o te Wai and recognise it explicitly provides for the use and take of resources.	Retain as notified.

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S3 Wairarapa Province of Federated Farmers	S3.003	New objective TAP	Amend	<p>Amend clause 3 of the long-term freshwater vision for Te Awarua-o-Porirua to remove reference to natural water flow and replace with 'natural form and character'.</p> <p>Amend clause 4 of the long-term freshwater vision for Te Awarua-o-Porirua to maintain balance between public access and private property rights, including being able to restrict access to one's business (e.g. a working farm) to manage risk.</p> <p>Add a new clause that explicitly recognises the importance of water for food growth and production and the relationship between high quality (nutritional) food and the health of people.</p>	<p>That clauses 3 and 4 of Objective TAP be amended as follows:</p> <p>3. Have restored and healthy ecosystems that support an abundance and diversity of indigenous species, and have a natural water flow <u>have natural form and character</u> and energy that demonstrate kei te ora te mauri (the mauri of the place is intact); and</p> <p>4. <u>Where appropriate and with the agreement of private landowners</u>, provide for safe access for people and communities to enjoy a range of recreational activities including fishing, fostering a strong connection to these waterbodies; and</p> <p>New clause: <u>Water is valued for the growth and production of high quality (nutritional) food that supports the health needs of people.</u></p> <p>That any consequential amendments be made to give effect to the above relief</p>
S4 Wellington City Council (WCC)	S4.002	New objective TAP	Amend	<p>Wellington City Context</p> <p>The proposed RPS visions are consistent with the Strategic Vision for Wellington (Wellington Towards 2040: Smart Capital) to be a climate-friendly, affordable, and welcoming eco-city to live for generations to come.</p>	<p><i>Objective TAP: Long-term freshwater vision for Te Awarua-o-Porirua:</i></p> <p><i>By the year 2100 Te Awarua-o-Porirua harbour, awa, wetlands,</i></p>

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				<p>Collectively, WCC's Three Waters network (drinking water, wastewater and stormwater) includes 2,653 km of pipes, 65 reservoirs, 103 pump stations, three treatment plants. WCC manages the global stormwater and wastewater discharge consents for the district and is thereby responsible for managing land-use and the stormwater and wastewater networks for Wellington.</p> <p>Infrastructure While active steps have been taken in improving the health and well-being of the environment within the WCC district, it should be noted that WCC has practical constraints in the management of its three waters network. As the network's infrastructure ages it requires higher levels of maintenance, which is also exacerbated by earthquake damage, as well as historical pressures on water infrastructure funding and uncertainty in future legislative requirements for the management of three waters infrastructure. WCC has funding constraints that will make it difficult to achieve significant improvements to network infrastructure quickly.</p> <p>Urban Development Wellington is projected to need an additional 30,407 dwellings over the next 30 years to satisfy urban growth demands. This will require significant infrastructure upgrades, which will be expensive and take years to undertake. A long-term approach will be needed to renew existing assets, provide for growth and ensure enhanced water quality outcomes can be delivered. It is important that both urban growth and water quality outcomes can be achieved. In this regard, a year 2100 target for achieving the proposed objectives of Variation 1 is supported. WCC would caution against reducing the vision's timeframes, as it is unlikely to be practicably achievable, for the previous stated reasons.</p>	<p><i>groundwater, estuaries and coast are healthy, wai ora, accessible, sustainable for future generations, and:</i></p> <ol style="list-style-type: none"> <i>1. The practices and tikanga associated with Te Awarua-o-Porirua are revitalized and protected; and</i> <i>2. Mahinga kai are abundant, healthy, diverse and can be safely gathered by Ngāti Toa Rangatira and served to Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and</i> <i>3. Have restored and healthy ecosystems that support an abundance and diversity of indigenous species, and have a natural water flow and energy that demonstrate kei te ora te mauri (the mauri of the place is intact); and</i> <i>4. Provide for safe access for people and communities to enjoy a range of recreational activities including fishing, fostering a strong connection to these waterbodies; and</i> <i>5. Are taken care of in partnership with Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa as kaitiaki for the mana of Te</i>

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				<p>Wellington City water quality improvements In the meantime, WCC is already engaging in multiple statutory and non-statutory processes to achieve water quality improvements, including:</p> <ul style="list-style-type: none"> •Prioritised water infrastructure upgrades; •Development of a Green Network Plan to deliver the many ecological, social, economic, cultural and public health benefits to the central city; •Introduced requirements for Water Sensitive Urban Design into the WCC Proposed District Plan; •Introduced requirements for Hydraulic Neutrality into the WCC Proposed District Plan; and •Wellington Water (on behalf of WCC) has developed a draft stormwater management strategy. <p>Proposed amendments WCC considers that the use of the terminology "does not compromise" is potentially inconsistent with 3.3(2)(b)&(c) of the National Policy Statement - Freshwater Management. Using "does not compromise" is potentially fraught, as it could be argued that even minor environmental effects could result in a compromising of water quality. If a literal or officious interpretation of "does not compromise" is enforced or informs future lower order Resource Management Act documents, such as the Natural Resources Plan, then this could have significant unreasonable implications for the take and use of freshwater. WCC considers that a more reasonable approach is the use of the term "sustainably manages". WCC is open to other terminology considerations which would more readily cater for reasonable use.</p>	<p><i>Awarua-o-Porirua as a taonga; and</i> 6. <i>Are resilient to the impacts of climate change; and</i> 7. <i>The use of water and waterways provide for social and economic use benefits, provided that such use does not <u>compromise sustainably manages</u> the health and well-being of waterbodies and freshwater ecosystems or the take and use of water for human health needs.</i></p>
S6 The New Zealand	S6.002	New objective TAP	Amend	Waka Kotahi submits in support of the objectives as notified but mat seek amendments for clarity as result of its ongoing engagement with GWRC and mana	N/A

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Transport Agency (NZTA)				whenua/tangata whenua. An example of the clarity is point four in both proposed objectives which relate to access to waterbodies and whether this raises health and safety or other effects which such locations include infrastructure.	
S1 Director-General of Conservation (DOC)	S1.003	New objective TWT	Support	Support. The proposed long-term freshwater vision appropriately gives effect to the National Policy Statement for Freshwater Management 2020 and Te Mana o te Wai.	Retain as notified.
S2 DairyNZ	S2.006	New objective TWT	Support	The timeframe included in the vision sets a clear, ambitious but reasonable timeframe of 2100. As noted in the s32 report accompanying this variation, delivering on the environmental outcomes proposed will impose significant costs. DairyNZ agrees that providing for reasonable timeframes to achieve the stated objectives is an important way to mitigate these costs and provide for an effective transition.	Retain as notified.
S2 DairyNZ	S2.007	New objective TWT	Oppose	An amendment to 'freshwater and coastal waterbodies' would make the provision more concise. The RMA definition of waterbody "water body means fresh water or geothermal water in a river, lake, stream, pond, wetland, or aquifer, or any part thereof, that is not located within the coastal marine area." This makes listing specific items unnecessary. Given the objective is geographically focused, it is important the objective refers to connected waterbodies.	Amend as follows: "By the year 2100 a state of wai ora is achieved for Te Whanganui-a-Tara in which connected harbour, awa, wetlands, groundwater estuaries and coast are freshwater & coastal waterbodies are , healthy, accessible, sustainable for future generations, and..."
S2 DairyNZ	S2.008	New objective TWT	Amend	This amendment would clarify that access to waterbodies is provided for when appropriate e.g. not required during storm event or swimming is not provided for during winter and high flows.	Amend as follows: Provide for the safe access and use of all rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of recreational

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					activities including fishing, <u>when appropriate</u> fostering an appreciation of and connection to these waterbodies; and
S2 DairyNZ	S2.009	New objective TWT	Support	The vision statements reflect the hierarchy of Te Mana o te Wai and recognise it explicitly provides for the use and take of resources.	Retain as notified.
S3 Wairarapa Province of Federated Farmers	S3.004	New objective TWT	Amend	<p>Amend clause 3 of the long-term freshwater vision for Te Whanganui-a-Tara to remove reference to natural water flow and add 'form' between natural and character.</p> <p>Amend clause 4 of the long-term freshwater vision for Te Whanganui-a-Tara to maintain balance between public access and private property rights, including being able to restrict access to one's business (e.g. a working farm) to manage risk.</p> <p>Add a new clause that explicitly recognises the importance of water for food growth and production and the relationship between high quality (nutritional) food and the health of people.</p>	<p>That clauses 3 and 4 of Objective TWT be amended as follows:</p> <p>3. Have mauri/mouri that is nurtured, strengthened and able to flourish and restored natural <u>form and</u> character, have a natural water flow, and ecosystems that support an abundance and diversity of indigenous species; and</p> <p>4. <u>Where appropriate and with the agreement of private landowners,</u> Provide for safe access and use of all rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of recreational activities including fishing, fostering an appreciation of and connection to these waterbodies; and</p> <p>New clause: <u>Water is valued for the growth and production of high quality (nutritional) food that supports the health needs of people.</u></p> <p>That any consequential amendments be made to give</p>

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					effect to the above relief
S4 Wellington City Council (WCC)	S4.003	New objective TWT	Amend	<p>Wellington City Context The proposed RPS visions are consistent with the Strategic Vision for Wellington (Wellington Towards 2040: Smart Capital) to be a climate-friendly, affordable, and welcoming eco-city to live for generations to come. Collectively, WCC's Three Waters network (drinking water, wastewater and stormwater) includes 2,653 km of pipes, 65 reservoirs, 103 pump stations, three treatment plants. WCC manages the global stormwater and wastewater discharge consents for the district and is thereby responsible for managing land-use and the stormwater and wastewater networks for Wellington.</p> <p>Infrastructure While active steps have been taken in improving the health and well-being of the environment within the WCC district, it should be noted that WCC has practical constraints in the management of its three waters network. As the network's infrastructure ages it requires higher levels of maintenance, which is also exacerbated by earthquake damage, as well as historical pressures on water infrastructure funding and uncertainty in future legislative requirements for the management of three waters infrastructure. WCC has funding constraints that will make it difficult to achieve significant improvements to network infrastructure quickly.</p> <p>Urban Development Wellington is projected to need an additional 30,407 dwellings over the next 30 years to satisfy urban growth demands. This will require significant infrastructure upgrades, which will be expensive and take years to undertake. A long-term approach will be needed to renew existing assets, provide for growth and ensure</p>	<p><i>Objective TWT: Long-term freshwater vision for Te Whanganui-a-Tara: By the year 2100 a state of wai ora is achieved for Te Whanganui-a-Tara in which the harbour, rivers, lakes, wetlands, groundwater, estuaries and coast are healthy, accessible, sustainable for future generations, and:</i></p> <ol style="list-style-type: none"> <i>1. The practices and tikanga associated with Te Whanganui-a-Tara are revitalized and protected; and</i> <i>2. Mahinga kai are abundant, healthy, diverse and can be safely gathered by Taranaki Whānui and Ngāti Toa Rangatira and served to Taranaki Whānui and Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and</i> <i>3. Have mauri/mouri that is nurtured, strengthened and able to flourish and restored natural character, have a natural water flow, and ecosystems that support an abundance and diversity of indigenous species; and</i> <i>4. Provide for the safe access and use of all rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of</i>

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				<p>enhanced water quality outcomes can be delivered. It is important that both urban growth and water quality outcomes can be achieved. In this regard, a year 2100 target for achieving the proposed objectives of Variation 1 is supported. WCC would caution against reducing the vision's timeframes, as it is unlikely to be practicably achievable, for the previous stated reasons. Wellington City water quality improvements</p> <p>In the meantime, WCC is already engaging in multiple statutory and non-statutory processes to achieve water quality improvements, including:</p> <ul style="list-style-type: none"> •Prioritised water infrastructure upgrades; •Development of a Green Network Plan to deliver the many ecological, social, economic, cultural and public health benefits to the central city; •Introduced requirements for Water Sensitive Urban Design into the WCC Proposed District Plan; •Introduced requirements for Hydraulic Neutrality into the WCC Proposed District Plan; and •Wellington Water (on behalf of WCC) has developed a draft stormwater management strategy. <p>Proposed amendments</p> <p>WCC considers that the use of the terminology "does not compromise" is potentially inconsistent with 3.3(2)(b)&(c) of the National Policy Statement - Freshwater Management. Using "does not compromise" is potentially fraught, as it could be argued that even minor environmental effects could result in a compromising of water quality. If a literal or officious interpretation of "does not compromise" is enforced or informs future lower order Resource Management Act documents, such as the Natural Resources Plan, then this could have significant unreasonable implications for the take and use of freshwater. WCC considers that a</p>	<p><i>recreational activities including fishing, fostering an appreciation of and connection to these waterbodies; and</i></p> <p><i>5. Are taken care of in partnership with Taranaki Whānui and Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa and Taranaki Whānui that respects the mana of Te Whanganui-a-Tara and the whakapapa connection with Taranaki Whānui and Ngāti Toa Rangatira; and</i></p> <p><i>6. Are resilient to the impacts of climate change; and</i></p> <p><i>7. The use of water and waterways provide for social and economic use benefits provided that such use does not <u>sustainably manages</u> the health and well-being of waterbodies and freshwater ecosystems or the take and use of water for human health needs.</i></p>

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				more reasonable approach is the use of the term "sustainably manages". WCC is open to other terminology considerations which would more readily cater for reasonable use.	
S6 The New Zealand Transport Agency (NZTA)	S6.003	New objective TWT	Amend	Waka Kotahi submits in support of the objectives as notified but mat seek amendments for clarity as result of its ongoing engagement with GWRC and mana whenua/tangata whenua. An example of the clarity is point four in both proposed objectives which relate to access to waterbodies and whether this raises health and safety or other effects which such locations include infrastructure.	N/A
S7 Winstone Aggregates	S7.002	New objective TWT	Support	<p>Winstone support the identification of the long-term visions for Te Whanganui-a-Tara and Te Awaruao-Porirua, noting that their Belmont Quarry is located with the Te Whanganui-a-Tara Whaitua. Winstone particularly support the clause (7) of Objective TWT...</p> <p>Recognising the beneficial use of water and waterways is fundamental to ensuring the long-term prosperity of Te Whanganui-a-Tara. Relevant to Winstone, this recognition extends to quarrying activities as one of those beneficial activities. The ongoing ability for the Wellington Region to access locally sourced aggregate, including Belmont Quarry, will be essential for their long-term future. Aggregate plays a vital role in the creation of new housing, businesses, roads, cycleways, and three waters infrastructure. Additionally, the Wellington Region is projected to grow by 200,000 people by the year 2050 and will require an additional 99,000 homes . There are also various transport infrastructure projects that will occur over the short- to medium-term, including:</p>	To retain recognition of the beneficial use of water and waterways in the long-term vision for Te Whanganui-a-Tara.

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				<ul style="list-style-type: none"> • Let's Get Wellington Moving, • Rail improvements, • Otaki to North Levin, • Cycleways and shared paths, • State Highway 55 improvements, and • The West-East Connection. 	
S1 Director-General of Conservation (DOC)	S1.004	New figure 3.4	Support	Support. This figure supports the insertion of new visions as supported above.	Retain as notified.
S2 DairyNZ	S2.010	New figure 3.4	Oppose	Map showing all whitua in region should be included in this figure so it does not need to be replaced at a later date if other whitua visions added.	Figure removed and whole region scale map included.
S3 Wairarapa Province of Federated Farmers	S3.005	New figure 3.4	Neutral	Further refinement of FMUs into part FMUs, with the development of appropriate longterm freshwater visions for each is required	N/A