

Appendix 2: Description of matters raised by Submitters (by issue)

N.B. Submission points highlighted green are addressed in multiple sub-issues. A detailed list of these submission points and the issues/sub-issues in which they are discussed are set out in Appendix 2.1 at the end of this document.

Issue 1: Categorisation of Provisions to the Freshwater Planning Process

Sub-issue(s)	Description of matters raised by submitters
Categorisation of provisions to the Freshwater Planning Process	Winstone Aggregates [S206.022] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.018]) raises concern with provisions being subject to the FPP where freshwater is only a peripheral issue to which the provision relates, and considers this is inappropriate use of the FPP, resulting in jurisdictional problems such as restricted appeal rights. Considers improper allocation results in delays and costs and is exacerbated by the proposed activity statuses being too restrictive. Accordingly, Winstone Aggregates seeks for a review of the scope of FPP versus P1S1 processes, and for only provisions where freshwater is the primary issue to be subject to the FPP, with the remaining provisions to be allocated to P1S1.

Issue 2: General comments

Sub-issue(s)	Description of matters raised by submitters
General support	<p>Pauatahanui Residents Association [S16.008] seeks for the retention of the objectives that seek to progressively improve the health of Te Awarua-o-Porirua’s groundwater, streams, wetlands and coastal marine environment.</p> <p>Lynn Cadenhead [S22.028] and Neil Deans [S29.015] seek for the provisions of Chapter 9 to be retained as notified.</p> <p>Christine Stanley [S26.001] supports the intent of improving water quality and ecological health objectives within Te Awarua-o-Porirua harbour.</p> <p>Pamela Govan [S40.002] supports the objectives for Te Whanganui-a-Tara and Te Awarua-o-Porirua, with no specific relief sought.</p> <p>Friends of Waipāhihi Karori Stream [S107.003] note particular support for the proposed timeframes for achieving the TAS; and proposed measures to reduce wet weather overflows and dry weather discharges from the wastewater system, noting their preference they are removed completely but acknowledging the complexity in doing so.</p> <p>Yvonne Weeber [S183.003] (supported by MPHRCI [FS27.003] and the Minister of Conservation [FS42.004]) supports the freshwater and coastal water objectives of PC1, with no specific relief sought.</p> <p>Ray Beentjes [S185.005], Greg Davies [S197.004], Calum Bradbury [S233.005], Shonaugh Wright [S235.004], Andrew Esler [S244.004], John Western [S253.004] and Todd Henry [S283.004] support Te Mana o te Wai and the hierarchy of obligations, seeking for ecosystem health and contact recreation to be prioritised.</p> <p>Guardians of the Bays¹ support stronger environmental regulation in relation to rivers, streams and stormwater to the sea, and support the objectives for freshwater and coastal water.</p> <p>WFF [S193.001] (opposed by Forest & Bird [FS23.957]) generally agrees with the long-term overarching objectives for both whitua, and considers 2100 a realistic timeframe for those objectives, noting many TAS will take multiple generations to achieve.</p> <p>Te Rūnanga [S216.001] seeks for provisions relating to the protection and restoration of Te Awarua o Porirua and Te Whanganui a Tara to be confirmed, adopted and implemented. Te Rūnanga [S216.002] supports the proposed objectives and policies which set new direction for the restoration of rivers, lakes and natural wetlands for contact recreation and Māori customary use, noting their input into the draft plan change.</p> <p>Generation Zero [S221.003] supports the emphasis on the coastal receiving environment.</p> <p>Mary Beth Taylor [S230.001] (supported in part by Meridian [FS47.029]) supports provisions and rules that will lead to better outcomes for freshwater quantity and quality and considers they should be implemented swiftly and decisively.</p>

¹ [S186.002] (supported by MPHRCI [FS27.425]) and [S186.003] (supported by MPHRCI [FS27.426])

Sub-issue(s)	Description of matters raised by submitters
	<p>Isabella Cawthorn [S249.001] supports the water and indigenous biodiversity elements of PC1.</p> <p>Friends of Waiwhetu Stream [S284.001] (supported by MPHRCI [FS27.1187]) supports PC1 and the long-term view on water quality improvement, and supports the use of specific targets for 2040 and 2100.</p>
Broad/overarching concerns	<p>Friends of Waipāhihi Karori Stream [S107.002 and S107.006] raise the following:</p> <ul style="list-style-type: none"> • Note that monitoring of the Waipāhihi Karori Stream shows water quality to be poor, particularly from E. coli. • Consider the Waipāhihi Karori Stream and its community are most likely to be impacted by the timeline, though may not be a priority from a regional perspective. • Note a community desire for the safe use of the stream and more abundant biodiversity. <p>Ray Beentjes [S185.002], Victoria University Canoe Club [S187.002], Greg Davies [S197.002], Calum Bradbury [S233.002], Shonaugh Wright [S235.002], Andrew Esler [S244.002], John Western [S253.002] and Todd Henry [S283.002] raise concern about increased amounts of sediment coming from the Pakuratahi and Hutt Rivers when flows increase, and potential E. coli and pathogen loads in the water. They note the presence of algae in summer months when flows are low, resulting in issues with recreation and amenity as well as human health when making contact with water, and raise concern that river engineering such as railway iron degrades water quality and creates potential hazards for river users when slash and logs get caught on structures.</p> <p>Heather Phillips [S212.004, S212.007 and S212.009] raises the following concerns:</p> <ul style="list-style-type: none"> • Notes more gravel extraction from the Hutt River will be needed to cope with previous flood volumes, and that more sediment will enter the Te Whanganui-a-Tara Harbour when the stop banks are breached, therefore necessitating planning for extreme events. • Raises concern with a lack of mention of the Whakatiki River/Little Wainui River • Considers the inclusion of trout protection within PC1 is inconsistent with statements from other government departments. <p>Generation Zero [S221.007] supports Policy Package 1, raising concern for the number of part-FMUs where copper and zinc baseline are set for D and C.</p> <p>David and Pauline Innes [S234.004 and S234.008] and Craig Innes [S277.003 and S277.007] seek the following:</p> <ul style="list-style-type: none"> • Clarification on whether the stream near their property is scheduled and what wildlife has been identified, noting it is subject to multiple water control features associated with urban development. • Specification that there is no natural passage for fish in the stream. • Investigation of the extent of the wetland at the end of Moores Valley Road. <p>Friends of Waiwhetu Stream [S284.002] (supported by MPHRCI [FS27.1188]) raise concern regarding the poor quality of the Waiwhetu Stream, noting their support for:</p> <ul style="list-style-type: none"> • Targets for reduced contamination, especially for E Coli; • Requirement for territorial authorities to repair/maintain wastewater pipes and detect and remediate leaks and cross-contamination at properties; and • Alternative funding options for Councils for this work.
General suggestions	<p>Lynn Cadenhead [S22.002] and Neil Deans [S29.003] note that the community values of many water bodies has been compromised but continue to provide species habitat, and consider that collective action through the regional plan is required to ensure water bodies remain community assets.</p> <p>Heather Blissett [S45.004] suggests that the Regional Emergency Plan should be considered and that the restoration of mauri should include being able to drink water from anywhere.</p> <p>Isabella Cawthorn [S249.002] supports the objectives for all catchments in Te Upoko o te Ika, however suggests that “measurable” is defined in relation to the use of “on a trajectory of measurable improvement” to include a statistically significant or appropriate magnitude measure.</p>
Increase/improve protection measures	<p>Lynn Cadenhead [S22.007] seeks for the highest level of protection to be provided for waterways containing giant kokopu, shortjaw kokopu or lampreys, noting their vulnerability to environmental changes.</p> <p>Porirua Harbour Trust & Guardians of Pāuatahanui Inlet [S176.009] seeks clarification and strengthening of rules and methods to support actions to increase wetland habitat.</p> <p>Eight submitters² raise concerns with water quality, amenity, contact recreation, and natural form and character, and seek the following accordingly:</p>

² Ray Beentjes [S185.001 and S185.006], Victoria University Canoe Club [S187.001 and S187.005], Greg Davies [S197.001 and S197.005], Calum Bradbury [S233.001 and S233.006], Shonaugh Wright [S235.001 and S235.005], Andrew Esler [S244.001 and S244.005], John Western [S253.001 and S253.005] and Todd Henry [S283.001 S283.005]

Sub-issue(s)	Description of matters raised by submitters
	<ul style="list-style-type: none"> • Recognition in the plan of outstanding kayaking/packrafting/rafting values in the whaitua, noting outstanding kayaking, amenity and landscape values of the Hutt Gorge in particular. • More work by GWRC to monitor and preserve natural character, and to strengthen objectives, policies, and rules which allow the river to function more naturally, particularly in its reaches influenced by flood protection. • Targets for natural character that are similar to the targets set for water quality, with supporting objectives and policies. • More work to enhance water quality in the coastal environment, for use of “flat water” environments to learn and train without compromising health if contact is made with water. • Retain coastal water quality indicators/targets. <p>Forest & Bird [S261.004]³ seeks for the identification of values for each FMU, with at least one environmental outcome provided for each value, noting the environmental outcomes objectives appear to be combined but are unclear on what outcomes relate to which value.</p>
Implement Te Mana o te Wai	<p>Victoria University Canoe Club [S187.004] supports Te Mana o te Wai and the hierarchy of obligations, seeking for Te Mana o Te Wai and wai ora to be acknowledged throughout PC1 and for the prioritisation of ecosystem health and contact recreation.</p> <p>Water NZ [S246.002] (opposed by WWL [FS39.225]) and Isabella Cawthorn [S249.004] seek the following:</p> <ul style="list-style-type: none"> • Te Mana o te Wai hierarchy of obligations are made clearer in the definitions and objectives, including prioritising mana whenua, their whakapapa and tikanga, in freshwater management and decision making. • PC1 instils an integrated catchment approach that recognises the interconnected nature of a catchment, the receiving environments and Te Hurihanga Wai, and that includes wastewater, stormwater and drinking water supply, rather than individual plans or strategies for each network. • PC1 states clearly that Te Mana o te Wai guides all policy, plans and consents that impact on three waters, from the earliest stage of consideration and before options are presented to regional council, planning committee or consulted on with communities. <p>Forest & Bird [S261.006]⁴ seeks for Te Mana o te Wai to given effect to throughout the plan to protect ecosystem health, community health and the health of people.</p>
Oppose coastal provisions	<p>WIAL [S101.002] (opposed by Forest & Bird [FS23.1255]) seeks for the deletion of any reference to the coastal marine area from those provisions which seek to give effect to the NPS-FM, raising concern that this will result in the management of coastal resources in a way that is inconsistent with the NZCPS and the remaining sections of the NRP not subject to PC1, and will in appropriately apply freshwater management concepts to the coastal environment.</p>
Include interim milestones / shorter timeframes	<p>Lynn Cadenhead [S22.003 and S22.023], Neil Deans [S29.004 and S29.010] and Mary Hutchinson [S115.003] support Objectives WH.O1 – WH.O9, however seek for the inclusion of interim and measurable milestones supported by numerical objectives and monitoring programmes.</p> <p>Friends of Waipāhihi Karori Stream [S107.005 and S107.007] oppose any extension of the proposed timeframe for achieving the TAS, noting their opposition to submission to extent the timeframe to 2060. Friends of Waipāhihi Karori Stream consider the proposed timeframes would be strengthened by interim and measurable milestones and consider this essential should the timeframe be extended.</p> <p>Forest & Bird [S261.003]⁵ seeks for the provision of interim timeframes for TAS or for a shorter timeframe of no later than 2033, noting the NPS-FM requires targets states to be set at intervals of no longer than 10 years. Considers targets must reflect the state that achieves the long-term vision.</p> <p>Lynn Cadenhead [S22.006] seeks a fall-back date of 2035 should no other date be specified by 31 December 2026.</p>
Prioritisation	<p>WWL [S151.006] (supported by NZTA [FS28.126], opposed by Forest & Bird [FS23.1333]) raises the following:</p> <ul style="list-style-type: none"> • Generally supportive of the requirement to provide methodologies to prioritise sub-catchment upgrades or improvements as part of consent applications for stormwater network discharges and wastewater network discharges. Considers it appropriate that prioritisation methodologies, rather than the actual order of sub-catchments, are provided as part of the Wastewater Network Catchment Improvement Strategy (WNCIS) and Stormwater Management Strategy (SMS). • Considers that the prioritisation should be done in an integrated manner considering both stormwater and wastewater discharges concurrently and would be done with investors and mana whenua in a collaborative manner. Considers the range of factors that should influence prioritisation is greater than currently indicated within the plan change provisions. • Refers to figures that illustrate some of the matters identified within the plan change provisions that require prioritisation in respect of wastewater and stormwater network discharges on a sub-catchment basis, and the impact that the provisions as currently drafted may have in terms of requiring prioritisation. Notes this does not take into account broader matters that Wellington Water considers are necessary to ensure deliverability and implementation of sub-catchment upgrades and improvements.

³ supported by MPHRCI [FS27.623], supported in part by Hort NZ [FS1.007], opposed by NZFFA [FS9.331]

⁴ supported by MPHRCI [FS27.625] and Rangitāne [FS24.111], opposed by NZFFA [FS9.333]

⁵ supported by MPHRCI [FS27.622], opposed by NZFFA [FS9.330] and WWL [FS39.050]

Sub-issue(s)	Description of matters raised by submitters
	<ul style="list-style-type: none"> • Considers prioritisation should be undertaken in a more integrated manner so wastewater and stormwater discharges are upgraded at the same time for each sub-catchment. Concerned the number of provisions that could influence the prioritisation of sub-catchments for improvements is overly complicated and lacks clear direction. Considers prioritisation requirements should be made clearer in the plan change. • Considers matters such as efficiency of delivery, investment availability and allocation are considered during the process of prioritisation, to allow alignment with other work programmes and to ensure an integrated approach. • Considers the TAS requirements in PC1 would render the process of prioritising sub-catchments for improvement or upgrade meaningless due to the requirements to meet 2040 targets, and the use of terminology such as ‘reasonable timeframes’ within other provisions of PC1 creates additional uncertainty in relation to the prioritisation exercise. • Refers to Schedule C of submission where examples of provisions that may influence prioritisation methodologies have been identified. <p>Accordingly, WWL seeks the following relief:</p> <ul style="list-style-type: none"> • Matters to be considered when setting the prioritisation, or sequence, of sub-catchments should be listed (or cross-referred to) within: <ul style="list-style-type: none"> ○ Policy WH.P13 (stormwater) ○ Policy WH.P19 (wastewater) ○ Policy P.P12 (stormwater) ○ Policy P.P18 (wastewater) • Provisions within the plan change that specifically use the terminology ‘prioritise’ or ‘prioritisation’, or otherwise speak to the relative urgency of improving or enhancing certain values (other than those mentioned above), are redrafted to make it clear that they do not apply to applications for stormwater and wastewater network discharges • Consider the wording of provisions as they relate to varying levels of requirements such as ‘avoid’ or ‘protect’ in terms of the level of importance represented by the provisions, and how this could be considered to influence decision making on a prioritisation methodology. Ideally, these provisions would not apply to stormwater and wastewater network discharges either. <p>Pat van Berkel [S282.002] (supported by Donald Skerman [FS3.005]) seeks for a requirement to be included that water quality improvement is staged, with the timeline published and updated each year, in accordance with WIP recommendations.</p>
Robustness of evidence	<p>John Easther [S17.008] seeks for rural objectives to be described as aspirational, to be achieved over generations of landowners, raising the following:</p> <ul style="list-style-type: none"> • Notes reforestation through retirement can take hundreds of years. • Considers any disturbance of the stream bed yields high levels of decolouration which will exceed the generic requirements in the plan change. • Considers provisions of the plan change are unrealistic and are not based on evidence. • Considers the "reasonable timeframe" default of 2050 referred to in objective statements is not achievable within the Makara/Owhariu whitua. • Notes revegetation of stream channels and adjacent floodplains will take many years. <p>NZFFA Wellington [S36.018] raises the following:</p> <ul style="list-style-type: none"> • Considers there is no indication in GWRC’s water quality data of increased sediment in catchments with a high proportion of plantation forestry. • Notes the water clarity of Mangaroa River exceeds guidelines, the TAS set by the NPS-FM, but the test result in this case is an inappropriate surrogate measure for suspended solids and the test failure was due to a natural source of brown water. • Disputes the values for required sediment load reductions in Table 8.5 for Mangaroa River, and suggests the data interpretation for Wainuiomata/Black Creek is incorrect. mci • Notes the NPS-FM acknowledges that natural sources of brown water exist and allows different TAS to be set accordingly, which has not been done for Mangaroa and potentially Wainuiomata/Black Creek, although it has been done for Hulls Creek. • Concerned that the TAS values listed for Hulls Creek, Mangaroa and Black Creek appear to be default values from the tables and not adjusted to baseline values or reset by GWRC. • Suggests Hulls Creek does not drain a peat swamp and suggests buried iron adjacent to the railways activities is the source of the opalescent water (references photo in original submission). <p>Riu Huna Farm [S39.004 and S39.009] raises the following:</p> <ul style="list-style-type: none"> • Concern that the focus on sediment and erosion is based on data from a single monitoring point and the use of broad-brush modelling to identify potential erosion sources. • Concern that a single monitoring point is used to determine levels and sources of E. coli across multiple catchments. • Considers there is a need for a finer scale, regular water quality studies, and potentially monitoring at the scale of each farm. • Concern that insufficient information has been provided to identify water quality problems, impacting the ability to effectively target work for improvement. • Notes personal changes made to reduce sedimentation and potential deposition of biological pollution in small streams. • Considers that wider sources of contaminants across Mākara and Ohariu is speculative as there is only one water quality monitoring site. • Concern with little acknowledgement of major flood events and other construction works that have consequential potential for erosion and increased sedimentation.

Sub-issue(s)	Description of matters raised by submitters
	<p>Mākara and Ohariu large farms [S51.004] (supported by Diane Strugnell [FS12.3]) raises the following:</p> <ul style="list-style-type: none"> • Considers there is currently insufficient water quality data to identify where work should be targeted. • Notes there is almost no data which identifies the source of sediment or E. coli in streams, nor natural levels of sediment and E. coli. • Notes that there is only one water quality monitoring site for Mākara and Ohariu, which only covers the Mākara Stream catchment. • Considers there are streams within and outside the Mākara Stream catchment with good water quality, which would still be subject to land use restrictions • Seeks that a farm-scale and catchment-scale approach is adopted, rather than across a whitua or FMU. <p>Akatarawa Valley Residents⁶ consider that data on river quality throughout the catchment is required to understand the problem and determine, and seek for the use of relevant scientific evidence of sufficient spatial resolution as a basis to inform policy.</p> <p>David and Pauline Innes [S234.005] and Craig Innes [S277.004] object to the description of Wainuiomata-iti Stream (Wainuiomata Stream) and considers it must be described through a proper survey, noting it appears to be affected by bacterial life and that eels are the only species that appear to survive.</p> <p>John and Jacqueline Diggins [S250.005] raise concern that GWRC have assumed that all sediment in rivers is the result of human activity, noting the need to consider the proportion of sediment load that arises from natural erosion processes. John and Jacqueline Diggins seek for PC1 to be placed on hold until GWRC has established at least three monitoring points and a significant database to identify sources of water quality reduction within the Mangaroa and Akatarawa catchments.</p>
Riparian planting	<p>WFF [S193.013] (opposed by Forest & Bird [FS23.969]) raises the following regarding stream shading:</p> <ul style="list-style-type: none"> • Supportive of efforts to promote the progressive shading of streams, providing landowners are supported with financial assistance to fence, plant, and maintain plantings and the width of the plantings is reasonable. • Suggests stream shading may not assist the Council in meeting proposed TAS, citing studies. • Considers it is impractical or feasible to plant every stream, river, lake, wetland and spring margin. • Considers whilst stock exclusion from small streams (<1m) within the Mangaroa River and Mākara Stream catchments can make a contribution to addressing water quality issues there is little research on riparian management measures to reduce stream bank erosion. Cites Hugh (2016) which states that a one-size-fits-all approach to riparian management measures to reduce stream bank erosion is unlikely to be appropriate or effective. Considers this knowledge should be considered in FAPs to address interim and long-term priorities, including attaining the national bottom lines for TASs, and what can be achieved by interventionist policies. • Notes the s32 report links stream shading policies to the management of periphyton growth. Considers in nearly all part-FMUs the Council has insufficient data on periphyton biomass. Suggests the Council undertake further monitoring to understand periphyton growth characteristics in the region. Supports the Council’s intention to address periphyton growth in specific ‘hot spots’ through FAPs.
Mangaroa Peatland	<p>Mary Beth Taylor [S230.002] considers there should be a clearer definition of “Peatlands” under the RMA for their protection and restoration, and that the RAMSAR Convention should be applied to the Mangaroa Peatland.</p> <p>Pat van Berkel [S282.005] seeks for a reference to the Mangaroa Peatland in PC1.</p>
Involvement of Fish and Game	<p>Fish and Game [S188.006]⁷ seeks for regular reports to statutory managers and collaborator on outcomes of management and action plans.</p>
Amend to recognise RSI	<p>Ara Poutama [S248.008] seeks for the amendment of the long-term vision objectives for both whitua to recognise that restoration of natural character may not be possible in relation to RSI.</p>

⁶ John Van Nortwick & Jill Van Nortwick [S120.005], Karen Wallace & Mark Robbins [S121.005], Paul Lambert & Steph Lambert [S122.005], Sandy Cooper [S123.005], Fredrick Steensma [S124.005], Shoshanah (Shosh) Phillips [S125.005], Russell Judd & Cecile Judd [S126.005], Johanna Overdiep & Steve Sturgess [S127.005], Joany Grima & Allen Rockell [S128.005], Keith Budd & Liz Budd [S129.005], Pete Clark [S130.005], Gillian Taylor & Chris Taylor [S131.005], Hannah Dawson & Ryan Dawson [S132.005], Len Drabble [S133.005], Graeme Allan [S134.005], Joshua Wood [S135.005], Micayla Wood [S136.005], Jonathan Wood [S137.005], Tony Wood & Helen Wood [S138.005], Glenda Arnold [S139.005], Janet Collins [S140.005], George Hare [S141.005], Paul Arnold [S142.005], Chilly Brook Trust (Mary Redington) [S143.005], Gaylene Ward & Mike Ward [S144.005], Nigel Parry & Judy Parry [S145.005], Leanna Jackson & Carl Burns [S146.005], Joline Fowke & Owen Fowke [S147.005], Paul Baker [S148.005], Allan MacDonald [S149.005], Phyllis Strachan [S150.005], John Raffan & Heather Raffan [S152.005], Redington Family Trust (Mary Redington) [S153.005], Ash Barker & Kes Barker [S154.005], Susan Davidson [S155.005], John Bryce [S156.005], Dr Patricia Laing [S157.005], Erica Dawson [S158.005], Bruce Stevens & Theresa Stevens [S159.005], Dr Harold Cuffe [S160.005], Phil Kirycuk [S162.005], John Simister [S163.005], Sarah Purdy [S164.005], Dr Anna De Raadt & Roger Fairclough [S166.005], Allan and Sarah Kelly [S167.005], Barry Hearfield & Carol McGhie [S168.005], Karina Fraser & Grant Fraser [S170.005], Jessica Perno & Gavin Perno [S171.005], Thomas Davies [S172.005] and Pam Ritchie [S174.005]

⁷ supported by Forest & Bird [FS23.1162], MPGC [FS21.011] and MPHRCI [FS27.1095], opposed by NZFFA [FS9.006]

Issue 3: Definitions

Sub-issue(s)	Description of matters raised by submitters
Coastal water management units	Yvonne Weeber [S183.009] (supported by MPHRCI [FS27.009]), Guardians of the Bays [S186.005] (supported by MPHRCI [FS27.428]) and Generation Zero [S221.010] support the definition of “coastal water management units”, with no reasons stated or specific relief sought.
Environmental outcomes	<p>General support WCC [S33.008] supports the requirements for environmental outcomes and seeks the definition to be retained as notified.</p> <p>Yvonne Weeber [S183.015] (supported by MPHRCI [FS27.015]) and Guardians of the Bays [S186.009] (supported by MPHRCI [FS27.432]) support the definition of “environmental outcomes”, with no reasons stated or specific relief sought.</p> <p>Reference Objectives WH.O6, WH.O7 and WH.O8 and P.O5 and P.O6 Forest & Bird [S261.015]⁸ seeks for Objectives WH.O6, WH.O7 and WH.O8 and P.O5 and P.O6 to be referenced in the definition of “environmental outcomes” to meet NPS-FM requirements.</p>
Harbour arm catchments	Yvonne Weeber [S183.019] (supported by MPHRCI [FS27.019]) supports the definition of “harbour arm catchments”, with no reasons stated or specific relief sought.
Limit	<p>General support Yvonne Weeber [S183.029] (supported by MPHRCI [FS27.029]) supports the definition of “limit”, with no reasons stated or specific relief sought.</p> <p>Refer to NPS-FM PCC [S240.012] (opposed by NZFFA [FS9.109]) seeks the definition of “limit” be amended to refer to the NPS-FM to be more consistent with other definitions as follows:</p> <p style="text-align: center;"><i>Has the same meaning as given in section 1.4 of the National Policy Statement for Freshwater Management 2020:</i></p> <p style="text-align: center;"><i>A limit on resource use or a take limit.</i></p>
Part Freshwater Management Unit	<p>Yvonne Weeber [S183.033] (supported by MPHRCI [FS27.033]) supports the definition of “part freshwater management unit”, with no reasons stated or specific relief sought.</p> <p>UHCC [S225.040] (opposed by Forest & Bird [FS23.868]) seeks for the definition of “part freshwater management unit” to be retained as notified, with no reasons stated.</p>
Primary contact	Pat van Berkel [S282.006] seeks for the addition of a definition for “primary contact”.
Primary contact sites	<p>General support Yvonne Weeber [S183.034] (supported by MPHRCI [FS27.034]) supports the definition of “primary contact sites”, with no reasons stated or decision sought.</p> <p>Provide text-searchable maps and sites Pat van Berkel [S282.007] notes the definition of “primary contact sites” refers to Map 85, but that Map 85 is not text searchable, and seeks the following relief:</p> <ul style="list-style-type: none"> • Amendment so that all maps are text searchable • Addition of a text list of the sites in the definition so they are searchable in the document <p>Combine primary contact sites with Schedule H recreation sites WWL [S151.023] (opposed by Forest & Bird [FS23.1350]) and Civil Contractors NZ [S285.009]⁹ consider the definition of “primary contact sites” is unnecessarily complicated as it is separate from the coastal recreation sites, and seek the primary contact sites be combined with the Schedule H recreation sites.</p>
Whaitua	<p>General support UHCC [S225.049] (opposed by Forest & Bird [FS23.877]) supports the implementation of whaitua areas to align with the WIP, and seeks for the definition of “whaitua” to be retained as notified.</p> <p>Yvonne Weeber [S183.054] (supported by MPHRCI [FS27.054]) and Guardians of the Bays [S186.023] (supported by MPHRCI [FS27.446]) support the definition of “whaitua”, with no reasons stated or specific relief sought.</p>

⁸ supported by MPHRCI [FS27.634], opposed by NZFFA [FS9.342] and NZTA [FS28.065]⁹ supported by Goodman Contractors [FS35.009] and Multi Civil Contractors [FS49.009]

Sub-issue(s)	Description of matters raised by submitters
	<p>Create separate whitua for Makara/Ohariu catchments</p> <p>John Easter [S17.007] seeks for the creation of a separate whitua for the Makara/Ohariu catchments, noting they are isolated from the adjoining Wellington urban catchments and can not be managed as an integrated system.</p>

Issue 4: Objective WH.O1 (freshwater bodies and CMA wai ora by 2100)

Sub-issue(s)	Description of matters raised by submitters
General support	<p>WCC [S33.023] supports the goals set out in Objective WH.O1 and considers the 2100 appropriate, seeking for Objective WH.O1 to be retained as notified.</p> <p>Zealandia [S113.008] (supported by Forest & Bird [FS23.1518]) supports the vision to restore the āhua of freshwater bodies by 2100, with no decision sought.</p> <p>Taumata Arowai [S116.025] (supported by Forest & Bird [FS23.593]) seeks for Objective WH.O1 to be retained as notified (except as requested to be amended by mana whenua), noting their support for acknowledgement of Māori customary practice and use of wai, the partnership role of mana whenua in developing FAPs, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.</p> <p>Pareraho Forest Trust [S213.008] seeks for Objective WH.O1 to be retained as notified, noting their support of the improvement of freshwater health.</p> <p>UHCC [S225.059] (opposed by Forest & Bird [FS23.887]) seeks for Objective WH.O1 to be retained as notified, noting that it is an aspirational objective and would be difficult to measure.</p>
Shorten timeframe	<p>EDS [S222.022]¹⁰ seeks for the 2100 timeframe for Objective WH.O1 to be amended to 2050 to reflect the urgency of freshwater and biodiversity issues.</p> <p>Forest & Bird [S261.049]¹¹ considers 2100 is too far away to achieve wai ora, noting biodiversity loss and climate change as current threats, and suggests that different target timeframes could be provided for part-FMUs per the level of degradation in each catchment, noting some places may already be in a wai ora state. Accordingly, Forest & Bird seeks for the Objective WH.O1 timeframe to be amended to 2050; or for the provisions of part-FMU/catchment-specific timeframes that account for the relative ease/difficulty of achieving targets in different catchments.</p>
Include interim milestones	<p>Yvonne Weeber [S183.178] (supported by MPHRCI [FS27.178]) and Guardians of the Bays [S186.095] (supported by MPHRCI [FS27.518]) seek for the inclusion of interim and measurable milestones for 2035, 2050 and 2070 in Objective WH.O1.</p> <p>Fish and Game [S188.031]¹² seek for the inclusion of interim TAS at intervals of no more than 10 years for Objective WH.O1.</p>
Extend timeframe	<p>WWL [S151.054] (opposed by Forest & Bird [FS23.1381]) considers achieving wai ora by 2100 to be a significant task and seeks the timeframe for Objective WH.O1 to be amended to 2123.</p> <p>Kāinga Ora [S257.010]¹³ seeks Objective WH.O1 to be amended to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes.</p>
Application to critical infrastructure	<p>WIAL [S101.038] (opposed by Forest & Bird [FS23.1291]) supports the intent to improve the health of freshwater bodies and the coastal marine area, however considers “wai ora” can not be achieved at the Airport due to its operational and functional requirements. WIAL notes that higher order planning documents (such as the NPS-FM and NPS-IB) provide a pathway for specified infrastructure to undertake activities within freshwater bodies in accordance with the effects management hierarchy, and that the objective for wai ora by 2100 should be qualified rather than absolute. Accordingly, WIAL seeks either for:</p> <ul style="list-style-type: none"> Objective WH.O1 to be amended upon a review of the extent to which the objective should apply to sites containing critical infrastructure; and whether the objective is appropriate where it is necessary to utilise natural and physical resources to meet the economic and social needs of Wellington’s communities; or Deletion and reversion to the operative NRP.
Apply to natural freshwater bodies only	<p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.020] generally supports the intent of Objective WH.O1, however seeks it is amended to apply only to natural freshwater bodies to avoid unintended consequences, noting the following:</p> <ul style="list-style-type: none"> Notes the objective is all-inclusive (relates to the health of all freshwater bodies) and the wai ora state requires all freshwater bodies to have planted margins, further noting this may not be physically or legally possible.

¹⁰ supported by Forest & Bird [FS23.178] and MPHRCI [FS27.914], opposed in part by WIAL [FS31.007], opposed by Meridian [FS47.157], NZFFA [FS9.203], Winstone Aggregates [FS8.008] and WWL [FS39.004]

¹¹ supported by MPHRCI [FS27.668], opposed in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.030], R P Mansell; A J Mansell, & M R Mansell [FS26.014] and Transpower [FS20.019], opposed by Meridian [FS47.160], NZFFA [FS9.376], Winstone Aggregates [FS8.019] and WWL [FS39.070]

¹² supported by Forest & Bird [FS23.1187], MPGC [FS21.036] and MPHRCI [FS27.1120], opposed by NZFFA [FS9.031] and WWL [FS39.257]

¹³ supported by HUD [FS48.006] and NZTA [FS28.097], supported in part by Meridian [FS47.159] and WIAL [FS31.006]

Sub-issue(s)	Description of matters raised by submitters
	<ul style="list-style-type: none"> Notes that the “freshwater bodies” is not defined in the RMA, NPS-FM, NES-F, RPS or NRP, but freshwater is defined in the RMA as “means all water except coastal water and geothermal water”. Therefore considers that Objective WH.O1 will apply to roadside channels and man-made drains that convey freshwater and considers this impracticable and unnecessary.
Consequential changes	Kāinga Ora [S257.010] (supported by HUD [FS48.006] and NZTA [FS28.097], supported in part by Meridian [FS47.159] and WIAL [FS31.006]) seeks consequential changes to Objective WH.O1 where relevant to reconcile outcomes to changes sought by Kāinga Ora on specific rules.
Align with NPS-FM	<p>Kāinga Ora [S257.010] seeks amendments to Objective WH.O1 to align with and not go beyond what is required under the NPS-FM, noting the following:</p> <ul style="list-style-type: none"> Mostly supportive of the proposed objectives but notes that some objectives would be difficult to achieve. Seeks outcomes across PC1 to ensure the Plan Change does not extend beyond that necessary to implement the NPS-FM, noting the considerable additional regulatory burden such a framework imposes upon a range of stakeholders. Considers this appropriate to ensure PC1 does not unnecessarily fetter the ability to deliver development outcomes, noting the national significance of enabling urban development.
Include reference to ephemeral watercourses	<p>Forest & Bird [S261.049] seeks for the chapeau of Objective WH.O1 to be amended to include reference to ephemeral watercourses as follows:</p> <p><i>The health of all freshwater bodies, ephemeral watercourses, and the coastal marine area...</i></p>
Objective “Note”	<p>HCC [S211.006]¹⁴ seeks for “Note” to be deleted from Objective WH.O1, noting that clarification is required on whether the note (including the wai ora state) is part of the objective or an advisory note.</p> <p>EDS [S222.022]¹⁵ and Forest & Bird [S261.049] seek for the deletion of “Note” from Objective WH.O1, such that the wai ora state has legal effect as part of the objective.</p> <p>Taranaki Whānui [S286.018]¹⁶ considers the bullets are important for Objective WH.O1 and seeks for the deletion of “Note” accordingly.</p> <p>WWL [S151.054] (opposed by Forest & Bird [FS23.1381]) seeks clarification on the status of the note for Objective WH.O1, noting that the third bullet is replicated in Objective WH.O4.</p>
Clarify “wai ora state”	CFG [S288.038] (opposed by Forest & Bird [FS23.062]) seeks clarification on “wai ora state”, noting that natural character is not a condition fixed in time, and that climate change may mean natural character is not the same as current targets and risks legally enforceable unachievable goals. Accordingly, CFG seeks for the inclusion in Objective WH.O1 of a caveat that natural character refers to a water body’s state in response to a variety of input conditions that are managed to achieve a level of naturalness.
Delete “natural state”	PF Olsen Ltd [S18.017] seeks for the deletion of “natural state” from Objective WH.O1, with the inclusion of the best freshwater quality possible according to the receiving environment.
Clarify where Āhua is to be restored (first bullet)	<p>Horokiwi Quarries [S2.016] and Winstone Aggregates [S206.032] (supported by Meridian [FS47.155]) support the long-term vision for Whaitua Te Whanganui-a-Tara, however considers the restoration of Āhua should only occur where natural character has been degraded, otherwise there is an unrealistic requirement of what is being restored and the baseline state. Accordingly, Horokiwi Quarries and Winstone Aggregates seek for the first bullet of Objective WH.O1 to be amended as follows:</p> <p><i>Āhua (natural character) is restored where it has been degraded and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character</i></p> <p>Transpower [S177.018]¹⁷ supports progressive improvement of the health and wai ora of freshwater bodies and the coastal marine area, however considers the restoration of natural character is not reasonably achievable where existing RSI is located over or within freshwater bodies or the coastal marine area, raising concern that this implies that existing RSI may need to be removed and that new RSI may be inappropriate. Transpower considers the objective should acknowledge complete restoration of character may not be possible in all instances, particularly in relation to RSI. Accordingly, Transpower seeks for the first bullet of Objective WH.O1 to be amended as follows:</p> <p><i>Āhua (natural character) is restored to the extent that this is possible, and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character</i></p>
Delete/amend requirement for planted margins (second bullet)	<p>Horokiwi Quarries [S2.016] and Winstone Aggregates [S206.032] (supported by Meridian [FS47.155]) support the long-term vision for Whaitua Te Whanganui-a-Tara, however consider the requirements to plant the margins of freshwater bodies will not always be practicable as some freshwater bodies can not have planted margins (e.g. if they are piped or part of a concrete channel), seeking for the second bullet of Objective WH.O1 to be amended as follows:</p> <p><i>All freshwater bodies have planted margins as far as practicable</i></p>

¹⁴ supported by NZTA [FS28.003] and WIAL [FS31.005], supported in part by Meridian [FS47.156], opposed by Forest & Bird [FS23.352]

¹⁵ supported by Forest & Bird [FS23.178] and MPHRCI [FS27.914], opposed in part by WIAL [FS31.007], opposed by Meridian [FS47.157], NZFFA [FS9.203], Winstone Aggregates [FS8.008] and WWL [FS39.004]

¹⁶ supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.015] and Rangitāne [FS24.018], opposed in part by Meridian [FS47.161]

¹⁷ supported by NZTA [FS28.116], supported in part by Meridian [FS47.154] and WIAL [FS31.004], opposed by Forest & Bird [FS23.761]

Sub-issue(s)	Description of matters raised by submitters
	<p>WFF [S193.056] (supported by Hort NZ [FS1.027], opposed by Forest & Bird [FS23.1012]) seek for the deletion of the second bullet of Objective WH.O1, for consistency with the NPS-FM and WIPs, and for practical achievability.</p> <p>HCC [S211.006]¹⁸ supports the 100-year vision towards full restoration of waterways in Te Whanganui-a-Tara, however considers it is not physically possible for all water bodies to have planted margins, therefore seeking for the second bullet of Objective WH.O1 to be amended as follows:</p> <p style="text-align: center;"><i>All freshwater bodies have planted margins where possible</i></p> <p>The Minister of Conservation [S245.001]¹⁹ questions the achievability of planted margins in all water bodies and seeks for the second bullet of Objective WH.O2 to be amended as follows:</p> <p style="text-align: center;"><i>All freshwater bodies have vegetated margins where practicable</i></p>
Provide for customary practices throughout whole catchment (fifth bullet)	<p>Taranaki Whānui [S286.018] supports the restoration of waterways to wai ora in Te Whanganui-a-Tara, however seeks for mana whenua to undertake customary practices throughout the catchment rather than a designated range of locations, noting the objective could otherwise be achieved without any actions as customary practices can already be undertaken in a range of places. Accordingly, Taranaki Whānui seeks for the fifth bullet of Objective WH.O1 to be amended as follows:</p> <p style="text-align: center;"><i>Mana whenua are able to undertake customary practices at a range of places throughout the catchment.</i></p>
Provide for primary production	<p>WFF [S193.056] (supported by Hort NZ [FS1.027], opposed by Forest & Bird [FS23.1012]) seeks for Objective WH.O1 to be amended to provide for primary production as part of the long-term vision, for consistency with the NPS-FM and WIPs, and for practical achievability.</p>

Issue 5: Objective P.O1 (groundwater, rivers, lakes, natural wetlands, estuaries, harbours and CMA wai ora by 2100)

Sub-issue(s)	Description of matters raised by submitters
General support	<p>WCC [S33.074] supports the goals set out in Objective P.O1 and considers the 2100 timeframe appropriate, seeking for Objective P.O1 to be retained as notified.</p> <p>Taumata Arowai [S116.077] (supported by Forest & Bird [FS23.645]) seeks for Objective P.O1 to be retained as notified (except as requested to be amended by mana whenua), noting their support for acknowledgement of Māori customary practice and use of wai, the partnership role of mana whenua in developing FAPs, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.</p>
General oppose	<p>Pukerua Property Group [S241.020]²⁰ and Land Matters [S243.008] consider the use of stormwater control to manage or prevent land use is inconsistent with the integrated management principles of the RMA, seeking for Objective P.O1 to be deleted; if this is not granted, Pukerua Property Group and Land Matters seek for Objective P.O1 to be amended to provide opportunities for development within Porirua whaitua by removing avoidance principles and replacing them with the same effect/guidance as the operative NRP.</p>
Shorten timeframe	<p>EDS [S222.075]²¹ seeks for the Objective P.O1 timeframe to be amended to 2050 to give effect to the NPS-FM and to reflect the urgency of addressing freshwater and biodiversity issues.</p> <p>Forest & Bird [S261.133]²² considers 2100 is too far away to achieve wai ora, highlighting biodiversity loss and climate change as current threats. Forest & Bird suggests that different target timeframes could be provided for part FMUs, per the level of degradation in each catchment. Accordingly, Forest & Bird seeks for the target timeframe of Objective P.O1 to be amended to 2050; or for the provision of part-FMU/catchment specific timeframes that account for the relative ease/difficulty of achieving targets in different catchments.</p>
Include interim milestones	<p>Yvonne Weeber [S183.266] (supported by MPHRCI [FS27.266]) seeks for Objective P.O1 to be amended to include interim measurable milestones for 2035, 2050 and 2070.</p> <p>Fish and Game [S188.067]²³ seeks for interim targets to be set for Objective P.O1.</p>

¹⁸ supported by NZTA [FS28.003] and WIAL [FS31.005], supported in part by Meridian [FS47.156], opposed by Forest & Bird [FS23.352]

¹⁹ supported by Hort NZ [FS1.028], Meridian [FS47.158], NZTA [FS28.020] and Winstone Aggregates [FS8.040], opposed by Forest & Bird [FS23.463]

²⁰ supported in part by Land Matters [FS13.021 and FS13.043]

²¹ supported by Forest & Bird [FS23.231] and MPHRCI [FS27.967], opposed by NZFFA [FS9.256] and WWL [FS39.007]

²² supported by MPHRCI [FS27.752], opposed in part by R P Mansell; A J Mansell, & M R Mansell [FS26.025] and Transpower [FS20.034], opposed by NZFFA [FS9.460], NZTA [FS28.069] and WWL [FS39.071]

²³ supported by Forest & Bird [FS23.1223], MPGC [FS21.072] and MPHRCI [FS27.1156], opposed by NZFFA [FS9.067] and WWL [FS39.260]

Sub-issue(s)	Description of matters raised by submitters
Extend timeframe	<p>Wellington Water [S151.101] (opposed by Forest & Bird [FS23.1428]) considers achieving wai ora by 2100 to be a significant task and seeks for the Objective P.O1 timeframe to be extended to 2123.</p> <p>Kāinga Ora [S257.039]²⁴ seeks for Objective P.O1 to be amended to reflect an extended timeline for the achievement of TAS which takes into consideration the feasibility and cost of achieving the prescribed timeframes.</p>
Consequential changes	<p>Kāinga Ora [S257.039] (supported by NZTA [FS28.098], supported in part by Meridian [FS47.311]) seeks consequential change to Objective P.O1 where relevant to reconcile outcomes to changes sought by Kāinga Ora on specific rules.</p>
Align with NPS-FM	<p>Kāinga Ora [S257.039] seeks amendments to Objective P.O1 to align with and not go beyond what is required under the NPS-FM, noting the following:</p> <ul style="list-style-type: none"> • Mostly supportive of the proposed objectives but notes that some objectives would be difficult to achieve. <p>Seeks outcomes across PC1 to ensure the Plan Change does not extend beyond that necessary to implement the NPS-FM, noting the considerable additional regulatory burden such a framework imposes upon a range of stakeholders. Considers this appropriate to ensure PC1 does not unnecessarily fetter the ability to deliver development outcomes, noting the national significance of enabling urban development.</p>
Include reference to ephemeral watercourses	<p>Forest & Bird [S261.133]²⁵ seek for the chapeau of Objective P.O1 to include reference to ephemeral watercourses, on the basis that they hold ecological values.</p>
Delete “note”	<p>EDS [S222.075] seeks for the deletion of “Note” from Objective P.O1, such that wai ora state has legal effect and to give effect to the NPS-FM.</p> <p>PCC [S240.024]²⁶ supports the 100-year vision towards the full restoration of Te Awarua-o-Porirua waterways, however considers it is unclear if the wai ora state forms part of the objective or is an explanatory/advisory note; if it is intended to form part of the objective, PCC seek for the deletion of “Note” from Objective P.O1 accordingly.</p> <p>Forest & Bird [S261.133] considers the explanation of the wai ora state should form part of Objective P.O1, rather than being a note, and seeks for the deletion of “Note” accordingly.</p>
Clarify status of note	<p>WWL [S151.101] (opposed by Forest & Bird [FS23.1428]) considers the status of the note is unclear and seeks for Objective P.O1 to be clarified accordingly, noting the last two bullets are replicated in Objective P.O2.</p>
Delete or clarify first bullet	<p>WFF [S193.112] (supported by Hort NZ [FS1.057], opposed by Forest & Bird [FS23.1068]) seeks for the first bullet of Objective P.O1 to be deleted or clarified for consistency with the NPS-FM and WIP values.</p>
Delete/amend “natural state”	<p>PF Olsen Ltd [S18.043] considers the impact of population growth on water resources should be taken into account and seeks for the deletion of “natural state” from Objective P.O1, with the inclusion of the best freshwater quality possible according to the receiving environment.</p> <p>Christine Stanley [S26.012] seeks for Objective P.O1 to be amended as follows: <i>Mauri is restored and waters restored to a natural state where possible</i></p> <p>Transpower [S177.044]²⁷ supports progressive improvement of the health and wai ora of freshwater bodies and the coastal marine area, however considers the restoration of natural character is not reasonably achievable where existing RSI is located over or within freshwater bodies or the coastal marine area, raising concern that this implies that existing RSI may need to be removed and that new RSI may be inappropriate. Transpower considers the objective should acknowledge complete restoration of character may not be possible in all instances, particularly in relation to RSI. Accordingly, Transpower seeks for the second bullet of Objective P.O1 to be amended as follows:</p> <p style="text-align: center;"><i>Mauri is restored and waters are in a natural state, to the extent that this is possible</i></p> <p>WFF [S193.112] (supported by Hort NZ [FS1.057], opposed by Forest & Bird [FS23.1068]) seeks for the deletion of “in a natural state” from the second bullet of Objective P.O1, for consistency with the NPS-FM and WIP values.</p> <p>PCC [S240.024]²⁸ considers it is not possible for waters to be in a natural state without the full restoration of the catchment to a pre-human state, seeking for the second bullet of Objective P.O1 to be amended as follows:</p> <p style="text-align: center;"><i>Mauri is restored, and waters restored to are in a natural state where possible</i></p>

²⁴ supported by NZTA [FS28.098], supported in part by Meridian [FS47.311]

²⁵ supported by MPHRCI [FS27.752], opposed in part by R P Mansell; A J Mansell, & M R Mansell [FS26.025] and Transpower [FS20.034], opposed by NZFFA [FS9.460], NZTA [FS28.069] and WWL [FS39.071]

²⁶ supported by NZTA [FS28.110], supported in part by Meridian [FS47.310], opposed by NZFFA [FS9.121]

²⁷ supported by NZTA [FS28.119], supported in part by Meridian [FS47.309], opposed by Forest & Bird [FS23.787]

²⁸ supported by NZTA [FS28.110], supported in part by Meridian [FS47.310], opposed by NZFFA [FS9.121]

Sub-issue(s)	Description of matters raised by submitters
	CFG [S288.081] (opposed by Forest & Bird [FS23.105]) seeks clarification on the second bullet of Objective P.O1, noting that natural character is not a condition fixed in time, and that climate change may mean natural character is not the same as current targets and risks legally enforceable unachievable goals. Accordingly, CFG seeks for the inclusion of a caveat that natural character refers to a water body's state in response to a variety of input conditions that are managed to achieve a level of naturalness.
Amend to clarify “ripples” (fourth bullet)	Forest & Bird [S261.133] considers that riffle, run and pool sequences is clearer than “ripples” and seeks for the fourth bullet of Objective P.O1 to be amended as follows: <i>Rivers flow naturally, with ripples natural riffle, run, and pool habitat and the river beds are stony</i>
Delete or reword fourth bullet	WFF [S193.112] seeks for the fourth bullet of Objective P.O1 to be deleted, or reworded to express vision for natural character, for consistency with NPS-FM and WIP values.
Provide for primary production	WFF [S193.112] seeks for a bullet to be added to Objective P.O1 to provide for primary production, for consistency with the NPS-FM and WIP values.
Provide for reduction of harbour sedimentation	WFF [S193.112] seeks for a bullet to be added to Objective P.O1 to provide for harbour sedimentation to be reduced to a more natural level, for consistency with the NPS-FM and WIP values.

Issue 6: Objective WH.O2 (groundwater, rivers and natural wetlands towards wai ora by 2040)

Sub-issue(s)	Description of matters raised by submitters
General support	<p>Zealandia [S113.009] (supported by Forest & Bird [FS23.1519]) supports the specific goals of objective WH.O2.</p> <p>Taumata Arowai [S116.026] (supported by Forest & Bird [FS23.594]) seeks for Objective WH.O2 to be retained as notified (except as requested to be amended by mana whenua), noting their support for acknowledgement of Māori customary practice and use of wai, the partnership role of mana whenua in developing FAPs, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.</p> <p>In conjunction with their other relief sought for Objective WH.O2 (to extend timeframes, amend Clause (b) and combined Clauses (f) and (g) – refer sub-issues below), WWL [S151.055]²⁹ seeks for Clause (a) to be retained.</p> <p>Yvonne Weeber [S183.179] (supported by MPHRCI [FS27.179]) and Guardians of the Bays [S186.096] (supported by MPHRCI [FS27.519]) support Objective WH.O2, with no reasons stated or decision sought.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.021] seek for Objective WH.O2 to be retained as notified, however seek for consideration of the identification of acceptable targets for matters not covered by TAS, noting that Clauses (b) and (c) do not set clear or acceptable targets.</p> <p>Pareraho Forest Trust [S213.009] seeks for Objective WH.O2 to be retained as notified, noting that some streams have too much deposited sediment and that lowering sediment inputs from erosion-prone headwaters and earthworks will improve health and well-being.</p> <p>UHCC [S225.060] (opposed by Forest & Bird [FS23.888]) supports Objective WH.O2 in principle and seeks for it to be retained as notified, however notes they may have specific comments on policies and rules which implement the objective.</p> <p>CFG [S288.039] (opposed by Forest & Bird [FS23.063]) supports Objective WH.O2, with no reasons stated or decision sought.</p>
Shorten timeframe	<p>EDS [S222.023]³⁰ seeks for the 2040 timeframe in Objective WH.O2 to be amended to 2030 to reflect the urgency of freshwater and biodiversity issues.</p> <p>Forest & Bird [S261.050]³¹ considers 2040 is too far away to achieve “maintained” water quality, noting the intent of the Essential Freshwater program to halt freshwater degradation and "start making immediate improvements so water quality improves within five years", and biodiversity loss and climate change as current threats. Consequently, Forest & Bird seeks for the 2040 timeframe in Objective WH.O2 to be amended to 2030.</p>

²⁹ supported by NZTA [FS28.132], supported in part by Kāinga Ora [FS45.079], opposed by Forest & Bird [FS23.1382]

³⁰ supported by Forest & Bird [FS23.179] and MPHRCI [FS27.915], opposed in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.061], R P Mansell; A J Mansell, & M R Mansell [FS26.049], Transpower [FS20.003] and WIAL [FS31.008], opposed by NZFFA [FS9.204], Winstone Aggregates [FS8.009] and WWL [FS39.005]

³¹ supported by MPHRCI [FS27.669], opposed in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.031], R P Mansell; A J Mansell, & M R Mansell [FS26.015] and Transpower [FS20.020], opposed by NZFFA [FS9.377], NZTA [FS28.068], Winstone Aggregates [FS8.020] and WWL [FS39.021 and FS39.038]

Sub-issue(s)	Description of matters raised by submitters
Extend timeframe	<p>WCC [S33.024] (supported by Winstone Aggregates [FS8.034] and WWL [FS39.232]) seeks for the Objective WH.O2 timeframe to be amended from 2040 to 2060, as they consider the 2040 timeframe difficult to achieve and does not take into account the environmental and financial constraints of WCC. WCC considers a 2060 timeframe to be consistent with their spatial planning framework, the LTP and financing for the three waters network.</p> <p>WWL [S151.055] seeks for the timeframe for Objective WH.O2 to be amended to 2060, as they consider this is insufficient time to achieve the required outcomes and renders prioritisation of sub-catchments meaningless.</p> <p>WFF [S193.057] (supported in part by Hort NZ [FS1.029], opposed by Forest & Bird [FS23.1013]) seeks for the deletion of “by 2040” from Objective WH.O2 and for the provision of timeframes for the achievement of TAS to be developed through the FAP process, to be incorporated into a future variation.</p>
Review applicability to critical infrastructure	<p>WIAL [S101.039] (opposed by Forest & Bird [FS23.1292]) supports the intent of Objective WH.O2, however considers there are practical difficulties with an absolute requirement for wai ora to be achieved. WIAL considers it is important to recognise that the trajectory required by the objective is to be applied at a whaitua or catchment-wide level, and that localised effects will not necessarily preclude overall outcomes from being achieved, noting higher order planning documents (such as the NPS-FM and NPS-IB) which provide a pathway for specified infrastructure to undertake activities within freshwater bodies.</p> <p>Accordingly, WIAL seeks for either for Objective WH.O2 to be deleted and reverted to the operative NRP, or:</p> <ul style="list-style-type: none"> • Amended to clarify that the reference to the health and wellbeing of Te Whanganui-a-Tara is at a broad, regional level (therefore recognising that localised effects may arise from specified infrastructure undertaking activities in rivers and wetlands); and • Amendments as appropriate upon a review of the extent to which the objective should apply to sites containing critical infrastructure; and whether the objective is appropriate where it is necessary to utilise natural and physical resources to meet the economic and social needs of Wellington’s communities.
Include reference to ephemeral watercourses (chapeau)	<p>Forest & Bird [S261.050] seeks for the chapeau of Objective WH.O2 to be amended to include reference to ephemeral watercourses on the basis that they can support high ecological values:</p> <p style="text-align: center;"><i>The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers, ephemeral watercourses, and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora...</i></p>
Include reference to natural form and character (Clause (a))	<p>EDS [S222.023] and Forest & Bird [S261.050] seek for Clause (a) of Objective WH.O2 to be amended to include reference to natural form and character, and to refer to ecosystem health, for consistency with the NPS-FM. Forest & Bird specifically suggests the following wording:</p> <p style="text-align: center;"><i>(a) water quality, habitats, natural form and character... are at a level where the state of aquatic life ecosystem health is meaningfully improved...</i></p>
Delete/amend Clause (b)	<p>NZFFA Wellington [S36.036] seeks for natural levels to be better defined in Objective WH.O2 and considers the use of baseline data or other agreed TAS more realistic.</p> <p>Fulton Hogan [S43.007] (supported by Winstone Aggregates [FS8.026]) supports the improvement of water quality by 2040, however seeks for Clause (b) of Objective WH.O2 to be clarified as follows:</p> <p style="text-align: center;"><i>(b) the hydrology of rivers and erosion processes, including bank stability are improved and sources of sediment are reduced to a more natural level in comparison to the levels as at 1 November 2023, and</i></p> <p>WWL [S151.055] considers a maintenance component should be included in Clause (b) of Objective WH.O2 rather than improvement only, seeking the following amendments:</p> <p style="text-align: center;"><i>the hydrology of rivers and erosion processes, including bank stability, are maintained and improved where degraded and sources of sediment are reduced to a more natural level, and</i></p> <p>WFF [S193.057] (supported in part by Hort NZ [FS1.029], opposed by Forest & Bird [FS23.1013]) seeks either for:</p> <ul style="list-style-type: none"> • The deletion of Clauses (a)-(h) of Objective WH.O2; or • The deletion of “to a more natural state” from Clause (b).

Sub-issue(s)	Description of matters raised by submitters
Provide for valued introduced species (Clause (d))	Fish and Game [S188.032] ³² notes that valued introduced species and their habitats have legislative protections which often lead to improvements for indigenous freshwater species, seeking for Clause (d) of Objective WH.O2 to be amended as follows: <i>(d) diversity, abundance, composition, structure, and condition of mahinga kai species and communities, including valued introduced species, has increased.</i>
Clarify Clauses (f) and (g)	WWL [S151.055] seeks for Clause (f) and (g) of Objective WH.O2 to be combined or better distinguished.
Add priority contact recreation sites to Clause (g)	WFF [S193.057] (supported in part by Hort NZ [FS1.029], opposed by Forest & Bird [FS23.1013]) seeks for Clause (g) of Objective WH.O2 to be amended to add at priority contact recreation sites.
Add clause for primary production	WFF [S193.057] (supported in part by Hort NZ [FS1.029], opposed by Forest & Bird [FS23.1013]) seeks for a clause to be added to Objective WH.O2 to provide for reliable water to support primary production.
Amend Schedule B	Taranaki Whānui ³³ supports the restoration of Te Whanganui-a-Tara's waterways towards wai ora by 2040, however seeks for Schedule B to be amended in consultation with mana whenua to reflect mahinga kai values and outcomes, including those in Te Mahere wai o Te Kāhui Taiao.
Provide for the needs of communities	Louise Askin [S9.011] supports the objectives as they reflect the WIP objectives, however raises concern that Objective WH.O2 does not acknowledge the value that rural communities place on productive land or their role as kaitiaki for Wellington's waterways, seeking for the addition of a new clause: <i>(i) Rural communities are thriving and integrating productive land use and healthy waterways on farms, forests and lifestyle blocks.</i> Ian Stewart [S32.001] considers Objective WH.O2 is not the most appropriate way to achieve the purpose of the Act or clause (c) of the objective of the NPS-FM, and considers a lack of incorporation of the purpose and national direction leads to regulatory overreach and conflicts with the NPS-HPL. Ian Stewart seeks for the following wording to be added after Clause (h) of Objective WH.O2: <i>In achieving this trajectory, the following priorities will be recognised:</i> <i>a) Providing for the health needs of people (such as drinking water).</i> <i>b) Maintaining the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</i>

Issue 7: Objective P.O2 (groundwater, rivers, lakes and natural wetlands towards wai ora by 2040)

Sub-issue(s)	Description of matters raised by submitters
General support	Taumata Arowai [S116.078] (supported by Forest & Bird [FS23.646]) seeks for Objective P.O2 to be retained as notified (except as requested to be amended by mana whenua), noting their support for acknowledgement of Māori customary practice and use of wai, the partnership role of mana whenua in developing FAPs, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater. Yvonne Weeber [S183.267] (supported by MPHRCI [FS27.267]) and CFG [S288.082] (opposed by Forest & Bird [FS23.106]) support Objective P.O2, with no reasons stated or decision sought.
General oppose	Pukerua Property Group [S241.021] (supported in part by Land Matters [FS13.022 and FS13.044]) and Land Matters [S243.009] consider the use of stormwater control to manage or prevent land use is inconsistent with the integrated management principles of the RMA and seek for Objective P.O2 to be deleted; if it is not deleted, Pukerua Property Group and Land Matters seek for the objective to be amended to remove avoidance principles and replaced with the same effect/guidance as the remainder of the NRP prior to notification.
Shorten timeframe	EDS [S222.076] ³⁴ seeks for the Objective P.O2 timeframe to be amended from 2040 to 2030 to reflect the urgency of freshwater and biodiversity issues and for consistency with the NPS-FM. Forest & Bird [S261.134] ³⁵ also seeks for the Objective P.O2 timeframe to be amended to 2040 to give effect to the NPS-FM.

³² supported by Forest & Bird [FS23.1188], MPGC [FS21.037] and MPHRCI [FS27.1121], opposed by NZFFA [FS9.032]

³³ [S286.006] (supported by Rangitāne [FS24.004], with a neutral/not stated stance from Ātiawa ki Whakarongotai Charitable Trust [FS2.006]) and [S286.019] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.016], supported by Rangitāne [FS24.019])

³⁴ supported by Forest & Bird [FS23.232] and MPHRCI [FS27.968], opposed in part by R P Mansell; A J Mansell, & M R Mansell [FS26.056] and Transpower [FS20.011], opposed by NZFFA [FS9.257] and WWL [FS39.008]

³⁵ supported by MPHRCI [FS27.753], opposed in part by R P Mansell; A J Mansell, & M R Mansell [FS26.026] and Transpower [FS20.035], opposed by NZFFA [FS9.461], NZTA [FS28.070] and WWL [FS39.025 and FS39.042]

Sub-issue(s)	Description of matters raised by submitters
Extend timeframe	<p>WCC [S33.075] (supported by WWL [FS39.242]) seeks for the Objective P.O2 timeframe to be amended from 2040 to 2060, as they consider the 2040 timeframe difficult to achieve and does not take into account the environmental and financial constraints of WCC. WCC considers a 2060 timeframe to be consistent with their spatial planning framework, the LTP and financing for the three waters network.</p> <p>WWL [S151.102] (opposed by Forest & Bird [FS23.1429]) seeks for the Objective P.O2 timeframe to be amended to 2060, raising concern that meaningful improvement may not be achieved by 2040 despite meaning progress having been made. WWL considers the 2040 timeframe will result in the requirement for a large proportion of sub-catchments to be required in the short-term, rendering prioritisation upgrades meaningless.</p> <p>PCC [S240.025] (supported by WWL [FS39.131], opposed by NZFFA [FS9.122]) considers there are significant challenges to upgrade the wastewater network to achieve Objective P.O2 in terms of reducing E. coli by 2040 to achieve Clauses (f) and (g), seeking for these clauses to be subject to a timeframe of 2060:</p> <p>(...)</p> <p><i>(e) huanga of mahinga kai and Māori customary use for locations identified in Schedule B (Ngā Taonga Nui a Kiwa) are maintained or improved, and</i></p> <p><i>by 2060:</i></p> <p><i>(f) mana whenua are able to safely connect with freshwater and are able to practice their customary and cultural practices, including mahinga kai gathering, and</i></p> <p><i>(g) mana whenua and communities can safely connect with waterbodies and enjoy a wider range of activities, including swimming, paddling and food gathering, and</i></p> <p>(...)</p>
Set interim targets	Fish and Game [S188.068] ³⁶ seeks for interim targets to be set.
Include reference to ephemeral watercourses	<p>Forest & Bird [S261.134] seeks for the chapeau of Objective P.O2 to be amended to include reference to ephemeral watercourses, to give effect to the NPS-FM, as follows:</p> <p><i>The health of Te Awarua-o-Porirua’s groundwater, rivers, lakes, ephemeral watercourses, and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora...</i></p>
Link to TAS and locations	PCC [S240.025] notes that Objective P.O2 does not link to a table of TAS and considers it is unclear what locations and what specific state is required to be met. Notes that Objective WH.O8 sets out specific E. coli states for primary contact sites, but considers it is unclear what E.coli states must be achieved to meet primary contact outcomes under Clauses (f) and (g) outside of these specific sites. Accordingly, PCC seeks for Objective P.O2 to link to specific TAS and locations for outcomes being sought.
Include reference to natural form and character in Clause (a)	<p>EDS [S222.076] and Forest & Bird [S261.134] seek for Clause (a) of Objective P.O2 to be amended to include reference to natural form and character, and to refer to ecosystem health, for consistency with the NPS-FM. Forest & Bird specifically suggests the following wording:</p> <p><i>(a) water quality, habitats, natural form and character... are at a level where the state of aquatic life ecosystem health is meaningfully improved...</i></p>
Delete/amend Clause (b)	<p>Diane Strugnell [S5.006] seeks for Objective P.O2 to be amended to better define what is meant by “a more natural level”.</p> <p>Fulton Hogan Ltd [S43.019] seeks for Clause (b) of Objective P.O2 to be amended as follows: <i>(b) erosion processes, including bank stability, are improved to significantly reduce the sedimentation rate in the harbour to a more natural level in comparison to the levels as at 1 November 2023, and</i></p> <p>WFF [S193.113] (opposed by Forest & Bird [FS23.1069]) seeks for the deletion of Clause (b) of Objective P.O2, for consistency with the NPS-FM and NOF values, and to clarify the distinction between the trajectory of improvement and the achievement of wai ora.</p>
Delete Clause (d)	WFF [S193.113] seeks for the deletion of Clause (d) of Objective P.O2, for consistency with the NPS-FM and NOF values, and to clarify the distinction between the trajectory of improvement and the achievement of wai ora.
Delete Clause (f)	WFF [S193.113] seeks for the deletion of Clause (f) of Objective P.O2, for consistency with the NPS-FM and NOF values, and to clarify the distinction between the trajectory of improvement and the achievement of wai ora.

³⁶ supported by Forest & Bird [FS23.1224], MPGC [FS21.073] and MPHRCI [FS27.1157], opposed by NZFFA [FS9.068] and WWL [FS39.261]

Sub-issue(s)	Description of matters raised by submitters
Delete Clause (g)	WFF [S193.113] seeks for the deletion of Clause (g) of Objective P.O2, for consistency with the NPS-FM and NOF values, and to clarify the distinction between the trajectory of improvement and the achievement of wai ora.
Provide for primary production	WFF [S193.113] seeks for the addition of a clause to Objective P.O2 to provide primary production, including through the provision of reliable water, for consistency with the NPS-FM and NOF values, and to clarify the distinction between the trajectory of improvement and the achievement of wai ora.

Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)

Sub-issue(s)	Description of matters raised by submitters
General support	<p>CentrePort [S93.003] supports seeks for Objective WH.O3 to be retained as notified, noting their support in particular to “maintain or improve” water quality.</p> <p>WIAL [S101.041] (opposed by Forest & Bird [FS23.1294]) supports the coastal water objectives of Table 8.1 and seeks for it to be retained as notified.</p> <p>Zealandia [S113.010] (supported by Forest & Bird [FS23.1520]) supports Objective WH.O3, raising concern that current development works at the mouth of the Kaiwharawhara estuary intends to permanently restrict public access in relation to Clause (h).</p> <p>Taumata Arowai³⁷ seeks for Objectives WH.O3 and P.O3 to be retained as notified (except as requested to be amended by mana whenua), noting their support for acknowledgement of Māori customary practice and use of wai, the partnership role of mana whenua in developing FAPs, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.</p> <p>Yvonne Weeber³⁸ supports Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1, with no reasons stated or decision sought.</p> <p>Guardians of the Bays³⁹ support Objective WH.O3 and Table 8.1, with no reasons stated or decision sought.</p> <p>Pareraho Forest Trust [S213.010] seeks for Objective WH.O3 to be retained as notified and that the freshwater objectives result in improved parameters for the harbour and estuaries, rather than maintaining the current state.</p> <p>UHCC [S225.061] (opposed by Forest & Bird [FS23.889]) supports Objective WH.O3 in principle and seeks for it to be retained as notified, however notes they may have specific comments on policies and rules which implement the objective.</p> <p>CFG⁴⁰ supports Objectives WH.O3 and P.O3, with no reasons stated or decision sought.</p>
General oppose	<p>WWL⁴¹ opposes the provisions relating to coastal water objectives, raising the following concerns:</p> <ul style="list-style-type: none"> • Considers the coastal water objectives in Table 8.1 are generally appropriate parameters for coastal environmental health, however raises concern with a lack of information relating to baseline states and timeframes to meet requirements and therefore difficulty in determining whether improvement is measurable. Considers it is unclear how the TAS and coastal water objectives provisions will be assessed and measured. • Considers the uncertainty and lack of information in the provisions regarding the baseline state means that WWL can not undertake a full assessment of the potential impact that the provisions will have on their discharge consent applications and the prioritisation and implementation of sub-catchment improvements. • Considers that significant work will be required to achieve the necessary reduction in wet weather wastewater overflows, dry weather wastewater discharges and stormwater contamination by 2040. Considers that delivery of the network discharges programme at such a fast pace will impact on delivery of other important work programmes for Te Mana o te Wai such as storage lakes for drinking water supply to support increased minimum flows, wastewater treatment plant upgrades and the renewals programmes for both wastewater and water supply.

³⁷ [S116.027] (supported by Forest & Bird [FS23.595]) and [S116.079] (supported by Forest & Bird [FS23.647])

³⁸ [S183.180] (supported by MPHRCI [FS27.180]), [S183.181] (supported by MPHRCI [FS27.181]), [S183.268] (supported by MPHRCI [FS27.268]) and [S183.269] (supported by MPHRCI [FS27.269])

³⁹ [S186.097] (supported by MPHRCI [FS27.520]) and [S186.098] (supported by MPHRCI [FS27.521])

⁴⁰ [S288.040] (opposed by Forest & Bird [FS23.064]) and [S288.083] (opposed by Forest & Bird [FS23.107])

⁴¹ [S151.003] (supported by WCC [FS36.019], supported in part by Kāinga Ora [FS45.074], opposed by Forest & Bird [FS23.1330]) and [S151.004] (supported by WCC [FS36.020] and Winstone Aggregates [FS8.038], supported in part by WIAL [FS31.002], opposed by Forest & Bird [FS23.1331])

Sub-issue(s)	Description of matters raised by submitters
	Pukerua Property Group [S241.022] (supported in part by Land Matters [FS13.023 and FS13.045]) and Land Matters [S243.010] consider the use of stormwater control to manage or prevent land use is inconsistent with the integrated management principles of the RMA, seeking for Objective P.O3 to be deleted; if this is not granted, Pukerua Property Group and Land Matters seek for Objective P.O3 to be amended to provide opportunities for development within Porirua whaitua by removing avoidance principles and replacing them with the same effect/guidance as the operative NRP.
Shorten timeframe / set interim targets	Fish and Game [S188.069] ⁴² seeks for interim targets which set out SMART goals to be set for Objective P.O3. EDS ⁴³ seeks for the Objective WH.O3 and P.O3 timeframes to be amended from 2040 to 2030 to reflect the urgency of freshwater and biodiversity issues. Forest & Bird ⁴⁴ also seek for the Objective WH.O3 and P.O3 timeframes to be amended to 2030 as they consider the 2040 timeframe too far away to ensure coastal values in Te Whanganui-a-Tara are not compromised. Additionally, EDS ⁴⁵ and Forest & Bird ⁴⁶ seek for Tables 8.1 and 9.1 to be amended to include interim timeframes, in accordance with 3.11 of the NPS-FM.
Delete/extend timeframe	Christine Stanley [S26.013 and S26.014] raises concern with the costs of upgrading the wastewater network to achieve Objective P.O3, seeking the following relief: <ul style="list-style-type: none"> • Amend Clause (f) of Objective P.O3 to include a timeframe of “by 2060”. • Amend the Table 9.1 timeframe to 2060. WCC ⁴⁷ seeks for the timeframes in Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 to be amended from 2040 to 2060, as they consider the 2040 timeframe difficult to achieve and does not take into account the environmental and financial constraints of WCC. WCC considers a 2060 timeframe to be consistent with their spatial planning framework, the LTP and financing for the three waters network. WWL ⁴⁸ seeks for the timeframes in Objective WH.O3 and Table 8.1 to be amended to 2060, raising concern that the 2040 timeframe will render prioritisation of sub-catchments meaningless. Similarly, WWL ⁴⁹ seeks for the timeframes in Objective P.O3 and Table 9.1 to be amended to 2060, on the basis that many ecosystems or habitats will take a long time to recover. WFF ⁵⁰ seeks for the timeframes in Tables 8.1 and 9.1 to be deleted, for consistency with the NPS-FM. HCC [S211.007] ⁵¹ seeks for the target state timeframes for E. coli and enterococci in Table 8.1 to be amended to 2060, as they consider the 2040 timeframe to be unaffordable. HCC considers that repairing the public network would only reduce a portion of the contaminant load, noting substantial costs to landowners to upgrade pipes within the private wastewater network to meet the proposed 2040 target, particularly in relation to Clauses (g) and (h) of Objective WH.O3. HCC raises concern with a lack of information on the achievability of TAS, and considers the funding requirements on housing and business development capacity is not sufficiently explored in the s32 evaluation. PCC [S240.027] ⁵² seeks for the target state timeframes for E. coli and enterococci in Table 9.1 to be amended to 2060, raising similar concerns to HCC. Additionally, PCC [S240.026] ⁵³ seeks for Objective P.O3 to be amended such that Clauses (g) and (h) are subject to a timeframe of 2060, noting significant costs to upgrade the wastewater network to achieve the required E. coli reductions by 2040.
Provide further detail on baseline states and required timeframes	WWL ⁵⁴ considers the coastal water objectives are generally appropriate for environmental health, however lack information relating to baseline states for CWMUs and timeframes to meet the requirements, noting this makes it difficult to determine whether improvement can be measured. Accordingly, WWL seeks for Tables 8.1 and 9.1 to be withdrawn until further detail on baseline states and required timeframes are provided in Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1.

⁴² supported by Forest & Bird [FS23.1225], MGC [FS21.074] and MPHRCI [FS27.1158], opposed by NZFFA [FS9.069] and WWL [FS39.262]

⁴³ [S222.024] (supported by Forest & Bird [FS23.180] and MPHRCI [FS27.916], opposed by CentrePort [FS40.006], NZFFA [FS9.205] and WWL [FS39.014]) and [S222.077] (supported by Forest & Bird [FS23.233] and MPHRCI [FS27.969], opposed by NZFFA [FS9.258] and WWL [FS39.003 and FS39.017])

⁴⁴ [S261.051] (supported by MPHRCI [FS27.670], opposed by CentrePort [FS40.001], NZFFA [FS9.378], WCC [FS36.058] and WWL [FS39.057]) and [S261.135] (supported by MPHRCI [FS27.754], opposed by NZFFA [FS9.462] and WWL [FS39.065])

⁴⁵ [S222.025] (supported by Forest & Bird [FS23.181] and MPHRCI [FS27.917], opposed by CentrePort [FS40.007], NZFFA [FS9.206], WIAL [FS31.011] and WWL [FS39.002 and FS39.015]) and [S222.078] (supported by Forest & Bird [FS23.234] and MPHRCI [FS27.970], opposed by NZFFA [FS9.259] and WWL [FS39.011])

⁴⁶ [S261.052] (supported by MPHRCI [FS27.671], opposed by CentrePort [FS40.002], NZFFA [FS9.379], WIAL [FS31.012] and WWL [FS39.058]) and [S261.136] (supported by MPHRCI [FS27.755], opposed by NZFFA [FS9.463] and WWL [FS39.066])

⁴⁷ [S33.025] (supported by WWL [FS39.233]), [S33.026] (supported by WWL [FS39.234]), [S33.076] (supported by WWL [FS39.243]) and [S33.077] (supported by WWL [FS39.244])

⁴⁸ [S151.056] (supported by WCC [FS36.024], supported in part by Kāinga Ora [FS45.080], opposed by Forest & Bird [FS23.1383]) and WWL [S151.057] (supported by NZTA [FS28.133], opposed by Forest & Bird [FS23.1384])

⁴⁹ [S151.103] (supported by WCC [FS36.030], supported in part by Kāinga Ora [FS45.081], opposed by Forest & Bird [FS23.1430]) and [S151.104] (supported by NZTA [FS28.166], opposed by Forest & Bird [FS23.1431])

⁵⁰ [S193.059] (supported by Hort NZ [FS1.030], opposed by Forest & Bird [FS23.1015]) and [S193.115] (supported by Hort NZ [FS1.058], opposed by Forest & Bird [FS23.1071])

⁵¹ supported by Winstone Aggregates [FS8.028] and WWL [FS39.092], opposed by Forest & Bird [FS23.353]

⁵² supported by WCC [FS36.014] and WWL [FS39.133], opposed by NZFFA [FS9.124]

⁵³ supported by WWL [FS39.132], opposed by NZFFA [FS9.123]

⁵⁴ [S151.056] (supported by WCC [FS36.024], supported in part by Kāinga Ora [FS45.080], opposed by Forest & Bird [FS23.1383]), [S151.057] (supported by NZTA [FS28.133], opposed by Forest & Bird [FS23.1384]), [S151.103] (supported by WCC [FS36.030], supported in part by Kāinga Ora [FS45.081], opposed by Forest & Bird [FS23.1430]) and [S151.104] (supported by NZTA [FS28.166], opposed by Forest & Bird [FS23.1431])

Sub-issue(s)	Description of matters raised by submitters
Review applicability to critical infrastructure	WIAL [S101.040] (opposed by Forest & Bird [FS23.1293]) supports the general intention of Objective WH.O3, however seeks the following relief: <ul style="list-style-type: none"> Amend Objective WH.O3 upon a review of the extent to which the should apply to sites containing critical infrastructure; and whether the objective is appropriate where it is necessary to utilise natural and physical resources to meet the economic and social needs of Wellington’s communities; or Delete and revert to the operative NRP.
Clarify “health and wellbeing” (chapeau)	WIAL [S101.040] (opposed by Forest & Bird [FS23.1293]) considers “the health and wellbeing of coastal water quality” in Objective WH.O3 is unclear, therefore seeking the following relief: <ul style="list-style-type: none"> Amend Objective WH.O3 chapeau: The health and wellbeing of the cCoastal water quality, and the health and wellbeing of ecosystems and habitats in Te Whanganui-a-Tara is maintained and improved to achieve...; or Delete and revert to the operative NRP.
Amend “or improved” (chapeau)	WWL ⁵⁵ considers that where improvement is required for the coastal water objectives, the requirement should be that the Objective has been achieved or meaningful progress has been made, similar to Clause (a) of Objective WH.O2. Accordingly, WWL seeks for Objectives WH.O3 and P.O3 to be amended as follows: <p style="text-align: center;"><i>The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained, or improved or meaningful progress has been made towards improvement to achieve the coastal water objectives set out in Table 8.1, and by 2040 2060.</i></p> WFF [S193.058] (opposed by Forest & Bird [FS23.1014]) seeks for Objective WH.O3 to be amended for consistency with Objective WH.O8: <ul style="list-style-type: none"> Amend chapeau: <i>The health and wellbeing of coastal water quality... are at least maintained or improved where TAS are not met and by 2040...</i> Delete Clauses (e) – (h) WFF [S193.114] (opposed by Forest & Bird [FS23.1070]) seeks similar relief for Objective P.O3: <ul style="list-style-type: none"> Amend chapeau to delete “to achieve” to read “improve where TAS are not met” Delete Clauses (a) – (h)
Define “high contaminant concentrations” and provide maps (Clause (b))	WWL ⁵⁶ seeks for “high contaminant concentrations” in Clause (b) of Objectives WH.O3 and P.O3 to be defined, to clarify the work involved and when the clause is relevant. Additionally, WWL seeks for maps to be provided showing locations of high contaminant concentrations and for Objectives WH.O3 and P.O3 to be amended accordingly.
Provide for valued introduced species (Clause (c))	Fish and Game [S188.033] ⁵⁷ notes that valued introduced species and their habitats have legislative protections which often lead to improvements for indigenous freshwater species, seeking for Clause (c) of Objective WH.O3 to be amended as follows: <p style="text-align: center;"><i>(c) diversity, abundance, composition, structure, and condition of mahinga kai species and communities, including valued introduced species, has increased.</i></p>
Recognise physical access will not be appropriate in all situations	WIAL [S101.040] (opposed by Forest & Bird [FS23.1293]) supports the general intent of Objective WH.O3, however raises concern that Clauses (g) and (h) do not recognise that, for health and safety reasons, it may not be appropriate to provide a physical connection to the coast, seeking either for Objective WH.O3 to be amended accordingly; or deleted and reverted to the operative NRP.
Clarify Clauses (g) and (h)	WWL ⁵⁸ seeks for Clauses (g) and (h) to be combined or better distinguished.
Include parameter for turbidity	EDS ⁵⁹ and Forest & Bird ⁶⁰ seek for the addition of a parameter for turbidity to Tables 8.1 and 9.1, to be worded as follows: <ul style="list-style-type: none"> Table 8.1 <p style="text-align: center;"><i>Unit: NTU</i></p> <p style="text-align: center;"><i>Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser</i></p>

⁵⁵ [S151.056] (supported by WCC [FS36.024], supported in part by Kāinga Ora [FS45.080], opposed by Forest & Bird [FS23.1383] and [S151.103] (supported by WCC [FS36.030], supported in part by Kāinga Ora [FS45.081], opposed by Forest & Bird [FS23.1430])

⁵⁶ [S151.056] (supported by WCC [FS36.024], supported in part by Kāinga Ora [FS45.080], opposed by Forest & Bird [FS23.1383]) and [S151.103] (supported by WCC [FS36.030], supported in part by Kāinga Ora [FS45.081], opposed by Forest & Bird [FS23.1430])

⁵⁷ supported by Forest & Bird [FS23.1189], MPGC [FS21.038] and MPHRCI [FS27.1122], opposed by NZFFA [FS9.033] and WIAL [FS31.010]

⁵⁸ [S151.056] (supported by WCC [FS36.024], supported in part by Kāinga Ora [FS45.080], opposed by Forest & Bird [FS23.1383]) and [S151.103] (supported by WCC [FS36.030], supported in part by Kāinga Ora [FS45.081], opposed by Forest & Bird [FS23.1430])

⁵⁹ [S222.025] (supported by Forest & Bird [FS23.181] and MPHRCI [FS27.917], opposed by CentrePort [FS40.007], NZFFA [FS9.206], WIAL [FS31.011] and WWL [FS39.002 and FS39.015]) and [S222.078] (supported by Forest & Bird [FS23.234] and MPHRCI [FS27.970], opposed by NZFFA [FS9.259] and WWL [FS39.011])

⁶⁰ [S261.052] (supported by MPHRCI [FS27.671], opposed by CentrePort [FS40.002], NZFFA [FS9.379], WIAL [FS31.012] and WWL [FS39.058]) and [S261.136] (supported by MPHRCI [FS27.755], opposed by NZFFA [FS9.463] and WWL [FS39.066])

Sub-issue(s)	Description of matters raised by submitters
	<p><i>Te Whanganui-a-Tara Harbour and estuaries, Makara Estuary, Wainuiomata Estuary: <6.9</i></p> <p><i>Wai Tai: No discernible change</i></p> <ul style="list-style-type: none"> • Table 9.1 <p><i>Unit: NTU;</i></p> <p><i>Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser;</i></p> <p><i>Onepoto Arm: <10.8,</i></p> <p><i>Pauatahanui Inlet: <6.9;</i></p> <p><i>Open Coast: No discernible change</i></p>
Add parameters for narrative objectives	EDS ⁶¹ and Forest & Bird ⁶² seek for further parameters to be added to Tables 8.1 and 9.1 (such as lead, dissolved oxygen, temperature, pH, secchi depth, chlorophyll-a, total phosphorous, total nitrogen, nitrite-nitrate nitrogen, ammoniacal nitrogen, and faecal coliforms) to ensure the narrative objectives in Table 3.8 of the operative NRP are met.
Amend wai tai / open coast unit for enterococci	EDS ⁶³ and Forest & Bird ⁶⁴ seek for the Wai Tai / Open Coast units for enterococci in Tables 8.1 and 9.1 to be amended from <200 to <40.
Add column for measured baseline state	WFF ⁶⁵ seeks for the addition of a column for measured baseline state in Tables 8.1 and 9.1.
Amend numeric targets to “maintain or improve”	WFF ⁶⁶ seeks for the numeric targets in Tables 8.1 and 9.1 to be amended to read “maintain or improve”.
Add clause directing collection of robust baseline data	WFF [S193.114] (opposed by Forest & Bird [FS23.1070]) seeks for the addition of a clause to Objective P.O3 which directs the collection of robust baseline data and the development of prioritised timeframes for TAS, for incorporation into a future variation.
Further consideration of feasibility and costs	NZTA [S275.010] (supported by WCC [FS36.002], opposed by Forest & Bird [FS23.704]) supports the intent to reduce contaminant loads, however considers it is unclear if and how reduction can be sustained, and that further information should be provided before targets are adopted. NZTA considers the s32 assessment of economic costs is insufficient, citing particular sections. Consequently, NZTA seeks for further consideration of the feasibility and costs of the targets in Objective P.O3.
Prioritise new funding streams and monitoring	Taranaki Whānui ⁶⁷ supports the restoration of waterways in Te Whanganui-a-Tara towards wai ora by 2040, however notes significant infrastructure investment is required by 2040 to meet the E. coli target, raising concern that it will not be achievable with current funding mechanisms. Taranaki Whānui seeks for the Objective WH.O3 and Table 8.1 to be retained as notified, provided that Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and regular monitoring and reporting is undertaken on progress towards the target.

⁶¹ [S222.025] (supported by Forest & Bird [FS23.181] and MPHRCI [FS27.917], opposed by CentrePort [FS40.007], NZFFA [FS9.206], WIAL [FS31.011] and WWL [FS39.002 and FS39.015]) and [S222.078] (supported by Forest & Bird [FS23.234] and MPHRCI [FS27.970], opposed by NZFFA [FS9.259] and WWL [FS39.011])

⁶² [S261.052] (supported by MPHRCI [FS27.671], opposed by CentrePort [FS40.002], NZFFA [FS9.379], WIAL [FS31.012] and WWL [FS39.058]) and [S261.136] (supported by MPHRCI [FS27.755], opposed by NZFFA [FS9.463] and WWL [FS39.066])

⁶³ [S222.025] (supported by Forest & Bird [FS23.181] and MPHRCI [FS27.917], opposed by CentrePort [FS40.007], NZFFA [FS9.206], WIAL [FS31.011] and WWL [FS39.002 and FS39.015]) and [S222.078] (supported by Forest & Bird [FS23.234] and MPHRCI [FS27.970], opposed by NZFFA [FS9.259] and WWL [FS39.011])

⁶⁴ [S261.052] (supported by MPHRCI [FS27.671], opposed by CentrePort [FS40.002], NZFFA [FS9.379], WIAL [FS31.012] and WWL [FS39.058]) and [S261.136] (supported by MPHRCI [FS27.755], opposed by NZFFA [FS9.463] and WWL [FS39.066])

⁶⁵ [S193.059] (supported by Hort NZ [FS1.030], opposed by Forest & Bird [FS23.1015]) and [S193.115] (supported by Hort NZ [FS1.058], opposed by Forest & Bird [FS23.1071])

⁶⁶ [S193.059] (supported by Hort NZ [FS1.030], opposed by Forest & Bird [FS23.1015]) and [S193.115] (supported by Hort NZ [FS1.058], opposed by Forest & Bird [FS23.1071])

⁶⁷ [S286.020] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.017], Rangitāne [FS24.020] and WWL [FS39.183]) and [S286.021] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.018], Rangitāne [FS24.021] and WWL [FS39.184])

Issue 9: Objective WH.O5 (Parangarahu Lakes and associated natural wetlands towards wai ora by 2040) and Table 8.2 (target attribute states for lakes)

Sub-issue(s)	Description of matters raised by submitters
General support	<p>Zealandia [S113.011] (supported by Forest & Bird [FS23.1521]) seeks for Table 8.2 to be retained as notified, with no reasons stated.</p> <p>Taumata Arowai [S116.028] (supported by Forest & Bird [FS23.596]) seeks for Objective WH.O5 to be retained as notified (except as requested to be amended by mana whenua), noting their support for acknowledgement of Māori customary practice and use of wai, the partnership role of mana whenua in developing FAPs, and acknowledgment of the need to engage with mana whenua in rules for discharges of wastewater and stormwater.</p> <p>Yvonne Weeber⁶⁸ supports Objective WH.O5 and Table 8.2, with no reasons stated or decision sought.</p> <p>Guardians of the Bays [S186.100] (supported by MPHRCI [FS27.523]) supports Table 8.2, with no reasons stated or decision sought.</p> <p>Pareraho Forest Trust [S213.012] seeks for Objective WH.O5 to be retained as notified, noting their support for the recognition of mana whenua and the significance of rare/special lakes and wetlands in the whitua.</p> <p>Taranaki Whānui⁶⁹ supports Objective WH.O5 and Table 8.2 in principle, seeking for them to be retained as notified.</p>
Shorten timeframe	<p>EDS [S222.027]⁷⁰ seeks for the timeframe for Objective WH.O5 to be amended from 2040 to 2030 to give effect to the NPS-FM and reflect the urgency of freshwater and biodiversity issues. Similarly, Forest & Bird [S261.054]⁷¹ considers the Objective WH.O5 timeframe too far away to ensure coastal values are not compromised and seek for it to be amended to 2030.</p> <p>Additionally, EDS [S222.028]⁷² seeks for the timeframe for the achievement of states in Table 8.2 to be amended to 2030. Forest & Bird [S261.055]⁷³ also seeks for the Table 8.2 timeframes to be amended to 2030 and/or for interim target states to be set for 2033 at the latest, in accordance with the NPS-FM, if the timeframe remains at 2040.</p>
Extend timeframe	<p>WCC⁷⁴ seeks for the timeframes in Objective WH.O5 and Table 8.2 to be amended from 2040 to 2060, as they consider the 2040 timeframe difficult to achieve and does not take into account the environmental and financial constraints of WCC. WCC considers a 2060 timeframe to be consistent with their spatial planning framework, the LTP and financing for the three waters network.</p>
Carry over Table 3.5 attributes	<p>EDS [S222.028] and Forest & Bird [S261.055] seek for attributes from Table 3.5 of the NRP which have not been carried over to be included in Table 8.2, including for sediment, mahinga kai, fish and macroalgae.</p>
Revise TAS in accordance with NPS-FM Clause 3.11(8)	<p>PF Olsen [S18.018 and S18.019] seeks for the Table 8.2 TAS to be revised in accordance with Clause 3.11(8) of the NPS-FM as well as amendments to Objective WH.O5 as appropriate, noting the following:</p> <ul style="list-style-type: none"> • Considers insufficient consideration has been given to the environmental outcomes, TAS of receiving environments and connections between water bodies as required by Clause 3.11(8). • Questions the effectiveness of the proposed TAS and considers they do not reflect an adequate understanding of environmental outcomes. • Questions the use of freshwater accounting systems to inform the setting of TAS and emphasises the importance of accurate and up-to-date information.
Amend to reduce uncertainty	<p>WFF⁷⁵ seeks for Objective WH.O5 and Table 8.2 to be amended for consistency with Objective WH.O8 and with clause 1.6(2)(b) of the NPS-FM for the direction to take all practicable steps to reduce uncertainty:</p> <ul style="list-style-type: none"> • Amend Clause (a) to delete “to achieve” and amend to read “<i>improve where TAS are not met</i>”. • Delete Clauses (b)-(d). • Add clause directing the collection of robust data for assigning baseline state. • Delete Table 8.2 timeframe. • Delete Table 8.2 attributes which are based on unknown or limited data. • Add direction to Table 8.2 for the collection of robust data for the assignment of baseline state.

⁶⁸ [S183.183] (supported by MPHRCI [FS27.183]) and [S183.184] (supported by MPHRCI [FS27.184])

⁶⁹ [S286.023] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.020] and Rangitāne [FS24.023]) and [S286.024] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.021] and Rangitāne [FS24.024])

⁷⁰ supported by Forest & Bird [FS23.183] and MPHRCI [FS27.919], opposed by NZFFA [FS9.208], Winstone Aggregates [FS8.010] and WWL [FS39.006]

⁷¹ supported by MPHRCI [FS27.673], opposed by NZFFA [FS9.381] and WWL [FS39.059]

⁷² supported by Forest & Bird [FS23.184] and MPHRCI [FS27.920], opposed in part by Kāinga Ora [FS45.021], opposed by NZFFA [FS9.209], Winstone Aggregates [FS8.011] and WWL [FS39.009]

⁷³ supported by MPHRCI [FS27.674], opposed by NZFFA [FS9.382] and WWL [FS39.060]

⁷⁴ [S33.028] (supported by Winstone Aggregates [FS8.035] and WWL [FS39.235]) and [S33.029] (supported by WWL [FS39.236])

⁷⁵ [S193.061] (supported in part by Hort NZ [FS1.031], opposed by Forest & Bird [FS23.1017]) and [S193.062] (opposed by Forest & Bird [FS23.1018])

Issue 10: Objectives WH.O6 and WH.O7 (groundwater and aquitards)

Sub-issue(s)	Description of matters raised by submitters
General support	<p>Guardians of the Bays [S186.101] (supported by MPHRCI [FS27.524]), Fish and Game [S188.035]⁷⁶ and CFG [S288.042] (opposed by Forest & Bird [FS23.066]) support Objective WH.O6, with no reasons stated or decision sought.</p> <p>Yvonne Weeber [S183.185] (supported by MPHRCI [FS27.185]) supports Objective WH.O7, with no reasons stated or decision sought.</p> <p>EDS⁷⁷ supports Objectives WH.O6 and WH.O7 on the basis of giving effect to the NPS-FM, with no specific relief sought. Forest & Bird⁷⁸ and Taranaki Whānui⁷⁹ also support Objectives WH.O6 and WH.O7, seeking for them to be retained as notified.</p>
Clarify intent of objective	<p>GWRC [S238.010] (supported by Forest & Bird [FS23.313]) seeks to clarify the intent of Objective WH.O6 with the following amendments:</p> <ul style="list-style-type: none"> • Amend Objective WH.O6 text: <p style="margin-left: 40px;"><i>Groundwater flows and levels, and water quality, are maintained at levels that:</i></p> <p style="margin-left: 80px;"><i>(a) ensure base flows or levels in surface water bodies and springs are supported,</i></p> <p style="margin-left: 80px;"><i>(b) and salt-water intrusion into the aquifer is avoided and there is no landward movement of the salt water/freshwater interface, and...</i></p> • Renumber remaining clauses.
Amend “avoid” to “minimise” (Clause (a))	<p>UHCC [S225.063] (opposed by Forest & Bird [FS23.891]) supports the intent of Objective WH.O6, however raises concern that saltwater intrusion already occurs and can only be managed and mitigated rather than fully avoided, seeking for Clause (a) to be amended as follows:</p> <p style="margin-left: 40px;"><i>(a) ensure base flows or levels in surface water bodies and springs are supported and salt-water intrusion is <u>minimised</u> avoided, and</i></p>
Amend “protect” to “maintain” (Clauses (b) and (c))	<p>Horokiwi Quarries [S2.017] and Winstone Aggregates [S206.033] consider the direction in Clauses (b) and (c) of Objective WH.O6 to “protect” is inconsistent with the direction of policy 5 of the NPS-FM to “maintain”, noting that “protection” is only afforded to outstanding freshwater bodies and habitats of indigenous freshwater species through policies 8 and 9 of the NPS-FM, raising concern that this could lead to perverse outcomes and an inability for reasonable development to occur. Accordingly, Horokiwi Quarries and Winstone Aggregates seek for Clauses (b) and (c) of Objective WH.O6 to be amended as follows:</p> <ul style="list-style-type: none"> • Amend Clause (b): <i>(b) protect <u>maintain</u> groundwater dependent ecosystems, and</i> • Amend Clause (c): <i>(c) protect <u>maintain</u> ecosystems in connected surface water bodies, and</i> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.022] and R P Mansell; A J Mansell, & M R Mansell [S217.004] oppose the “protect” approach of Clauses (b) and (c) of Objective WH.O6 as they consider this leads to unnecessary restrictions in policies and rules to appropriately implement the objective. Guildford Timber, Silverstream Forest and Goodwin Estate and R P Mansell; A J Mansell, & M R Mansell consider an effects management approach in accordance with the NPS-FM is more appropriate and seek amendments to ensure consistency with Clauses (a), (d) and (e), as well as other objectives such as Objective WH.O9:</p> <ul style="list-style-type: none"> • Amend Clause (b): <i>protect <u>ensure that groundwater dependent ecosystems are maintained or improved where degraded</u></i> • Amend Clause (c): <i>protect <u>ensure that ecosystems in connected surface water bodies are maintained or improved where degraded, and</u></i>
Provide for primary production (amend Clause (d))	<p>WFF [S193.063] (supported by Hort NZ [FS1.032], opposed by Forest & Bird [FS23.1019]) seeks for Clause (d) of Objective WH.O6 to be amended to provide for sufficient reliability for the needs of communities and the primary production sector.</p>

⁷⁶ supported by Forest & Bird [FS23.1191], MPGC [FS21.040] and MPHRCI [FS27.1124], opposed by NZFFA [FS9.035]

⁷⁷ [S222.029] (supported by Forest & Bird [FS23.185] and MPHRCI [FS27.921], opposed by NZFFA [FS9.210]) and [S222.030] (supported by Forest & Bird [FS23.186] and MPHRCI [FS27.922], opposed by NZFFA [FS9.211])

⁷⁸ [S261.056] (supported by MPHRCI [FS27.675], opposed by NZFFA [FS9.383]) and [S261.057] (supported by MPHRCI [FS27.676], opposed by NZFFA [FS9.384])

⁷⁹ [S286.025] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.022] and Rangitāne [FS24.025]) and [S286.026] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.023] and Rangitāne [FS24.026])

Sub-issue(s)	Description of matters raised by submitters
Amend to avoid or minimise aquifer consolidation (Clause (f))	<p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.022] and R P Mansell; A J Mansell, & M R Mansell [S217.004] oppose the “avoid” approach of Clause (f) of Objective WH.O6 as they consider this leads to unnecessary restrictions in policies and rules to appropriately implement the objective. Guildford Timber, Silverstream Forest and Goodwin Estate and R P Mansell; A J Mansell, & M R Mansell consider an effects management approach in accordance with the NPS-FM is more appropriate and seek for Clause (f) of Objective WH.O6 to be amended as follows:</p> <p style="text-align: center;"><i>(f) avoid or minimise aquifer consolidation</i></p>
Clarify aquitard collapses and aquifer consolidation	<p>Horokiwi Quarries [S2.017] and Winstone Aggregates [S206.033] seek clarification on the term “aquitard consolidation” in Clause (f) of Objective WH.O6.</p> <p>Fish and Game [S188.036]⁸⁰ supports Objective WH.O7, however seeks clarification on how aquitard collapses will be prevented, noting that this can be caused by the removal of aquifer water via bore extraction (citing Zhang et al, 2014).</p>

Issue 11: Objective P.O5 (groundwater)

Sub-issue(s)	Description of matters raised by submitters
General support	<p>Yvonne Weeber [S183.271] (supported by MPHRCI [FS27.271]) and Fish and Game [S188.071]⁸¹ support Objective P.O5, with no reasons stated or decision sought.</p> <p>WFF [S193.117] (opposed by Forest & Bird [FS23.1073]) considers Objective P.O5 is proportionate to the context and seeks it is retained as notified.</p> <p>PCC [S240.029] (opposed by NZFFA [FS9.126]) seeks for Objective P.O5 to be retained as notified, noting their support in principle.</p> <p>Forest & Bird [S261.138] (supported by MPHRCI [FS27.757], opposed by NZFFA [FS9.465]) supports giving effect to the NPS-FM and seeks for Objective P.O5 to be retained as notified.</p>
Not stated	Wellington City Council [S33.079] is neutral on Objective P.O5, with no reasons stated or decision sought.
Oppose “protect” approach	<p>R P Mansell; A J Mansell, & M R Mansell [S217.014] raise concern that the “protect” approach will lead to unnecessarily restrictive policies and rules and considers an effects management approach is more appropriate, seeking for Objective P.O5 to be amended as follows:</p> <p style="text-align: center;"><i>Groundwater flows and levels, and water quality, are maintained at levels that protect ensure that:</i></p> <p style="text-align: center;"><i>(a) groundwater dependent ecosystems are maintained or improved where degraded, and</i></p> <p style="text-align: center;"><i>(b) the values of connected surface water bodies in places where groundwater flows to surface water are maintained or improved where degraded.</i></p>

Issue 12: Objective WH.O8 and Table 8.3 (freshwater primary contact site objective)

Sub-issue(s)	Description of matters raised by submitters
General support	<p>Yvonne Weeber⁸² supports Objective WH.O8 and Table 8.3, with no reasons stated or decision sought.</p> <p>UHCC [S225.064] (opposed by Forest & Bird [FS23.892]) supports Objective WH.O8 in principle and seeks for it to be retained as notified, however notes they may have specific comments on policies and rules which implement the objective.</p> <p>CFG [S288.043] (opposed by Forest & Bird [FS23.067]) supports Objective WH.O8, with no reasons stated or decision sought.</p>
General oppose	The Shellards [S202.007] raise concern that Table 8.3 lacks information relating to data collection, no date range for the collection of baseline data, or any ongoing major works (including deforestation/harvesting) which impact water quality, therefore seeking for the withdrawal of PC1 and the development of community-based education supported by measurements and reporting.

⁸⁰ supported by Forest & Bird [FS23.1192], MPGC [FS21.041] and MPHRCI [FS27.1125], opposed by NZFFA [FS9.036] and WWL [FS39.271]

⁸¹ supported by Forest & Bird [FS23.1227], MPGC [FS21.076] and MPHRCI [FS27.1160], opposed by NZFFA [FS9.071]

⁸² [S183.186] (supported by MPHRCI [FS27.186]) and [S183.187] (supported by MPHRCI [FS27.187])

Sub-issue(s)	Description of matters raised by submitters
Shorten timeframe	EDS [S222.031] ⁸³ seeks for the timeframe for Objective WH.O8 to be amended from 2040 to 2030 to reflect the urgency of freshwater and biodiversity issues. Forest & Bird [S261.058] ⁸⁴ also seeks for the Objective WH.O8 timeframe to be amended to 2030, as they consider 2040 too far away to achieve “at least maintained” water quality, noting the intent of the Essential Freshwater program to halt freshwater degradation and “start making immediate improvements so water quality improves within five years”. Additionally, Forest & Bird [S261.059] ⁸⁵ seeks for the Table 8.3 timeframes to be amended to 2030 and/or for interim target states to be set for 2033 at the latest, in accordance with the NPS-FM, if the timeframe remains at 2040.
Extend timeframe	WCC ⁸⁶ for the timeframes in Objective WH.O8 and Table 8.3 to be amended from 2040 to 2060, as they consider the 2040 timeframe difficult to achieve and does not take into account the environmental and financial constraints of WCC. WCC considers a 2060 timeframe to be consistent with their spatial planning framework, the LTP and financing for the three waters network. WWL [S151.058] (opposed by Forest & Bird [FS23.1385]) seeks for the timeframe for Objective WH.O8 to be amended to 2060, as they consider this is insufficient time to achieve the required outcomes and renders prioritisation of sub-catchments meaningless. HCC [S211.008] ⁸⁷ seeks for the Objective WH.O8 timeframe to be amended from 2040 to 2060, noting their support of the 2040 timeframe on the basis that it does not impose significant challenges and costs in relation to wastewater network upgrades to achieve E. coli reduction.
Clarify chapeau	Pat van Berkel [S282.010] (supported by Donald Skerman [FS3.007]) seeks for the chapeau of Objective WH.O8 to be amended as follows: <i>Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact by ensuring and ensure that by 2040:</i>
Revise TAS in accordance with NPS-FM Clause 3.11(8)	PF Olsen [S18.020] seeks for the Table 8.3 TAS to be revised in accordance with Clause 3.11(8) of the NPS-FM, noting the following: <ul style="list-style-type: none"> • Considers insufficient consideration has been given to the environmental outcomes, TAS of receiving environments and connections between water bodies as required by Clause 3.11(8). • Questions the effectiveness of the proposed TAS and considers they do not reflect an adequate understanding of environmental outcomes. • Questions the use of freshwater accounting systems to inform the setting of TAS and emphasises the importance of accurate and up-to-date information.
Consideration for other impacts for contact recreation	Fish and Game [S188.037] ⁸⁸ questions if the factors specified in Objective WH.O8 are the only factors causing water bodies to be unsuitable for contact recreation, and if there are other impacts which need to be managed to create primary contact sites within the rivers.
Add clause directing collection of robust baseline data	WFF [S193.064] (opposed by Forest & Bird [FS23.1020]) supports the prioritisation of primary contact sites for improvement, however seeks for the addition of a new clause to objective WH.O8 directing the collection of robust data for sites with insufficient information.
Add new primary contact sites	Pareraho Forest Trust [S213.013] seeks for the addition of Speedys Stream at Taniwha Pool to Map 85 as a primary contact site, as well as for any similar small stream sites of high recreational contact to be identified and added.
Provide for human health as the standard for contact recreation	Lynn Cadenhead [S22.024], Neil Deans [S29.011] and Mary Hutchinson [S115.004] support the numerical requirements of Table 8.3 and further seek that human health for contact recreation be the standard where water bodies are used for that purpose.
Add parameter for “swimmable days”	Pat van Berkel [S282.011] (supported by Donald Skerman [FS3.008]) seeks for the addition of a “swimmable days” parameter to Table 8.3, as it would be easily understood and encompasses all quality reasons for why a river is not swimmable.
Add parameter for benthic cyanobacteria or cyanobacteria blooms	Pat van Berkel [S282.011] (supported by Donald Skerman [FS3.008]) seeks for the addition of a benthic cyanobacteria or cyanobacteria blooms measure as a parameter to Table 8.3, noting it is a key measure for Te Awa Kairangi due to toxic algae in the river killing dogs and affecting people.
Address risk to dogs	In addition relation to Pat van Berkel’s relief sought for the addition of parameters to Table 8.3, Pat van Berkel [S282.010] (supported by Donald Skerman [FS3.007]), seeks for Objective WH.O8 to be amended to address risk to dogs, noting that Clause (b) does not cover risk to dogs as “primary contact” refers to humans.

⁸³ supported by Forest & Bird [FS23.187] and MPHRCI [FS27.923], opposed by NZFFA [FS9.212], Winstone Aggregates [FS8.012] and WWL [FS39.016]

⁸⁴ supported by MPHRCI [FS27.677], opposed by NZFFA [FS9.385] and WWL [FS39.061]

⁸⁵ supported by MPHRCI [FS27.678], opposed by NZFFA [FS9.386] and WWL [FS39.062]

⁸⁶ [S33.030] (supported by WWL [FS39.237]) and [S33.031] (supported by Winstone Aggregates [FS8.036], supported by WWL [FS39.238])

⁸⁷ supported by Winstone Aggregates [FS8.029] and WWL [FS39.093], opposed by Forest & Bird [FS23.354]

⁸⁸ supported by Forest & Bird [FS23.1193], MPGC [FS21.042] and MPHRCI [FS27.1126], opposed by NZFFA [FS9.037] and WWL [FS39.272]

Sub-issue(s)	Description of matters raised by submitters
Prioritise new funding streams and monitoring	Taranaki Whānui ⁸⁹ supports the restoration of waterways in Te Whanganui-a-Tara towards wai ora by 2040, however notes significant infrastructure investment is required by 2040 to meet the E. coli target, raising concern that it will not be achievable with current funding mechanisms. Taranaki Whānui seeks for the objective to be retained as notified, provided that Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and regular monitoring and reporting is undertaken on progress towards the target.

Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)

Sub-issue(s)	Description of matters raised by submitters
General support	<p>Lynn Cadenhead [S22.025] and Neil Deans [S29.012] support the TAS in Table 8.4 as notified. Mary Hutchinson [S115.005] also supports the TAS in Table 8.4, however with no specific decision sought.</p> <p>Jonny Osborne [S28.004] supports the timeframes for achieving TAS, noting changes will be expensive but that regulations should not be watered down.</p> <p>WCC [S33.032] supports Objective WH.O9 as notified, on the basis of maintaining and improving where appropriate.</p> <p>Amos Mann [S35.003] supports the TAS, however suggests they could be stronger.</p> <p>Pamela Govan [S40.003] supports the proposed TAS.</p> <p>Korokoro Environment Group [S106.001] notes there is a lack of baseline data for Korokoro Stream, however considers it appropriate to set high TAS for Korokoro Stream. Korokoro Environment Group further supports the inclusion of monitoring of Korokoro Stream and the tributary in Galbraiths Gully and seeks to be involved with community participation and information sharing.</p> <p>Taumata Arowai [S116.080] (supported by Forest & Bird [FS23.648]) supports acknowledgment of Māori customary practice and use of wai, and supports Objective P.O6 as notified (except as requested to be amended by mana whenua).</p> <p>In four submission points, Yvonne Weeber⁹⁰ supports Objective WH.O9 and Table 8.4, and Objective P.O6 and Table 9.2, with no reasons stated or decision sought.</p> <p>Ray Beentjes [S185.004], Greg Davies [S197.006], Calum Bradbury [S233.004], Shonaugh Wright [S235.006], Andrew Esler [S244.006], John Western [S253.006] and Todd Henry [S283.006] support the water quality target tables and seek for as much work to be done as possible through environmental limits to achieve the water quality targets.</p> <p>Fish and Game⁹¹ supports Objectives P.O6 and WH.O9, with no reasons stated or decision sought.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.023] support Objective WH.O9 as notified, particularly the reference to “at least maintaining” TAS in Clauses (b) and (c).</p> <p>Generation Zero [S221.004] endorses the TAS objective of Policy Package Option 1, suggesting for interim targets to be set to make the timeframe less divisive.</p> <p>UHCC [S225.065] (opposed by Forest & Bird [FS23.893]) supports Objective WH.O9 as notified, however notes there may be specific comments on policies and rules which implement the objective.</p> <p>PCC [S240.030] (opposed by NZFFA [FS9.127]) supports Objective P.O6 as notified.</p> <p>Isabella Cawthorn [S249.003] supports the TAS proposed for all catchments, excluding for Te Awarua-o-Porirua, where stronger TAS are sought.</p>

⁸⁹ [S286.027] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.024], Rangitāne [FS24.027] and WWL [FS39.185]) and [S286.028] (supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.025], Rangitāne [FS24.028] and WWL [FS39.186])

⁹⁰ [S183.188] (supported by MPHRCI [FS27.188]), [S183.189] (supported by MPHRCI [FS27.189]), [S183.272] (supported by MPHRCI [FS27.272]) and [S183.273] (supported by MPHRCI [FS27.273])

⁹¹ [S188.038] (supported by Forest & Bird [FS23.1194], MPGC [FS21.043] and MPHRCI [FS27.1127]), opposed by NZFFA [FS9.038] and [S188.072] (supported by Forest & Bird [FS23.1228], MPGC [FS21.077] and MPHRCI [FS27.1161]), opposed by NZFFA [FS9.072])

Sub-issue(s)	Description of matters raised by submitters
	<p>Pat van Berkel [S282.003] (supported by Donald Skerman [FS3.006]) seeks for the retention of the TAS for E. coli for 2040, noting this is preferred to 2060 on the basis that there is enough time to fund and implement.</p> <p>Taranaki Whānui [S286.029]⁹² supports Objective WH.O9 in principle and seeks it is retained as notified. However with regard to Table 8.4,</p>
General oppose	<p>NZFFA Wellington [S36.009] raise concern that the TAS have been erroneously propagated through PC1 to justify further control over plantation forestry, noting that pastoral farming is not subject to controlled activities.</p> <p>WWL⁹³ opposes the provisions relating to TAS and coastal water objectives, raising the following concerns:</p> <ul style="list-style-type: none"> • Considers there is a general lack of information relating to the baseline state to measure against, meaning it is not possible to determine whether the TAS parameters and requirements are reasonable, appropriate and achievable. • Considers the provisions do not currently recognise the complexities and contributing factors for achieving TAS and that meeting TAS for network discharges can not wholly sit with WWL as there are many factors within catchments that contribute to water quality, and the provisions do not reflect the magnitude of work involved in delivering water quality improvement. • Considers the uncertainty and lack of information in the provisions regarding the baseline state means that WWL can not undertake a full assessment of the potential impact that the provisions will have on their discharge consent applications and the prioritisation and implementation of sub-catchment improvements. • Considers it is likely that the TAS 2040 timeframe (particularly as it relates to E. coli), will result in the requirement for a large proportion of sub-catchments (or possibly all of them) to be upgraded in the short term, rendering prioritisation meaningless. • Considers that significant work will be required to achieve the necessary reduction in wet weather wastewater overflows, dry weather wastewater discharges and stormwater contamination by 2040. Considers that delivery of the network discharges programme at such a fast pace will impact on delivery of other important work programmes for Te Mana o te Wai such as storage lakes for drinking water supply to support increased minimum flows, wastewater treatment plant upgrades and the renewals programmes for both wastewater and water supply. <p>WFF [S193.007] (opposed by Forest & Bird [FS23.963]) raises the following:</p> <ul style="list-style-type: none"> • Supports progressive improvement towards the health and well-being of waterbodies in Te Awarua-o-Porirua Whaitua and Whaitua Te Whanganui-a-Tara. • Generally agrees with the overarching objectives in Chapters 8 (WH.O1) and 9 (P.O1), however seeks a provision for a thriving primary production sector. • Supports an interim timeframe of 2040 to ‘check in’ and see whether water quality is improving. • Does not consider all TASs will be achievable by 2040 due to a lack of quality data to establish baseline positions for all TAS. Suggests more work needs to be done to gather and collate this data so it can be used to inform the FAPs that will set out the pathway to achieving the TAS. • Considers 2040 is an unrealistic timeframe to meet all the proposed TASs set out in Tables 8.4 and 9.2. Considers the notes in Tables 8.4 and 9.2 indicate the Council has insufficient data on baseline states for some attributes and further monitoring and modelling is required to develop attribute state frameworks. • Considers further work is required by the Council, with mana whenua and communities, to develop and implement FAPs to address how TAS will be achieved. Notes it will take time to establish a robust body of evidence for the TAS baselines, and the plans on how to achieve TAS where they need to be improved. • Considers the TAS met should be maintained. Where they need to be improved, the tables should reflect realistic dates by which the TAS can be achieved • Considers milestone target dates do not have to be the same for all TAS and all part FMUs. Suggests prioritising part-FMUs where the Council can achieve 'easy-wins' or where human health is most likely to be impacted by poor water quality. Considers realistic timeframes can be determined when preparing FAPs and carried into the NRP through a variation. • Seeks relief that TAS and/or sites where there is limited or ‘insufficient data’ should be removed from Tables 8.4 and 9.2 as the baseline state cannot be reliably determined, and therefore it is not known whether the attribute and/or site needs to be maintained or improved. <p>NZFFA [S195.026] (opposed by Forest & Bird [FS23.429]) seeks for the withdrawal of Tables 8.4, 8.5 and 9.2, with reviews to be undertaken by an independent party before being reinstated, raising the following:</p> <ul style="list-style-type: none"> • Questions the use of a mix of states and numeric measurements, lack of information, and lack of acknowledgement that further measurements are required to determine a TAS.

⁹² supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.026] and Rangitāne [FS24.029]

⁹³ [S151.003] (supported by WCC [FS36.019], supported in part by Kāinga Ora [FS45.074], opposed by Forest & Bird [FS23.1330]) and [S151.004] (supported by WCC [FS36.020] and Winstone Aggregates [FS8.038], supported in part by WIAL [FS31.002], opposed by Forest & Bird [FS23.1331])

Sub-issue(s)	Description of matters raised by submitters
	<ul style="list-style-type: none"> Acknowledges many numeric attributes have not been measured but are the result of modelling. <p>The Shellards [S202.008] raise concern with the insufficiency of baseline data for Table 8.4 and seek the withdrawal of PC1, as well as the development of improvements through community-based support/education.</p>
General comment	<p>WCC [S33.080] is neutral on Objective P.O6, with no reasons stated or decision sought.</p> <p>Taranaki Whānui [S286.030]⁹⁴ supports the restoration of waterways in Te Whanganui-a-Tara towards wai ora by 2040, however notes significant infrastructure investment is required by 2040 to meet the E. coli target, raising concern that it will not be achievable with current funding mechanisms. Taranaki Whānui seeks for the objective to be retained as notified, provided that Method M45 is implemented as a priority and new infrastructure funding mechanisms are put in place; and regular monitoring and reporting is undertaken on progress towards the target. Taranaki Whānui [S286.003]⁹⁵ supports targets and timeframes with respect to contaminants, however notes significant infrastructure investment is required by 2040 to meet the E. coli target, raising concern that it will not be achievable with current funding mechanisms. Taranaki Whānui considers there is a need to prioritise and progress a programme of new streams of funding that do not rely on the existing ratepayer base.</p>
Strengthen provisions	<p>Overarching</p> <p>Forest & Bird [S261.002]⁹⁶ raises the following:</p> <ul style="list-style-type: none"> Considers TAS targets are too high in some part-FMUs and seeks they are amended. Notes the numeric target for the Taupo part-FMU appears to be above the modelled baseline and considers this impermissible as targets must be at or below the baseline. Considers TAS should be introduced for “habitat” and “natural form and character” to be included as targets for Habitat Quality Index / Natural Character Index scores, and/or physical properties to achieve for the river for consistency with Policy 30. <p>Shorten timeframes / include interim milestones</p> <p>EDS [S222.033] and [S222.079] and Forest & Bird [S261.061] and [S261.140] seek for the target timeframes in Tables 8.4 and 9.2 to be amended from 2040 to 2030, with the date from which maintenance will be continued to be outlined, in accordance with clause 3.11 of the NPS-FM. Alternatively, if the timeframe is to remain at 2040, EDS and Forest & Bird seek for interim states to be set at no longer than 10-year intervals.</p> <p>Porirua Harbour Trust & Guardians of Pāuatahanui Inlet [S176.002] seek the following:</p> <ul style="list-style-type: none"> Timeframes to contain interim and measurable milestones, including five-yearly reporting. Retention of dates recommended by Waitua Committee rather than pushing out the dates of achieving an improved attribute state by decades. <p>Fish and Game [S188.011]⁹⁷ seeks for interim TAS timeframes set for intervals of not more than 10 years, with baselines to be achieved by the interim target date set.</p> <p>“Improve” rather than “maintain”</p> <p>Isabella Cawthorn [S249.017] considers the term “maintain” is used too frequently and suggests “improve” may drive higher performance urban form in greenfield developments.</p> <p>Include natural form and character</p> <p>EDS [S222.032]⁹⁸ seeks for the chapeau of Objective WH.O9 to be amended to include natural form and character to give effect to the NPS-FM. Furthermore, EDS⁹⁹ seeks for Tables 8.4 and 9.2 to be amended (or a new table added) to include TAS for habitat and natural form and character using the Habitat Quality / Natural Character Index, with minimum targets set for the maintenance of habitat quality / natural character e.g. the minimum acceptable ratio of the current condition to the reference condition is 0.85.</p>

⁹⁴ supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.027], Rangitāne [FS24.030] and WWL [FS39.187]

⁹⁵ supported by Rangitāne [FS24.005] and WWL [FS39.181], with a neutral/not stated stance from Ātiawa ki Whakarongotai Charitable Trust [FS2.005]

⁹⁶ supported by MPHRCI [FS27.621], opposed in part by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.029], R P Mansell; A J Mansell, & M R Mansell [FS26.013] and Transpower [FS20.018], opposed by NZFFA [FS9.329], opposed by WWL [FS39.032 and FS39.049]

⁹⁷ supported by Forest & Bird [FS23.1167], MPGC [FS21.016] and MPHRCI [FS27.1100], opposed by NZFFA [FS9.011] and WWL [FS39.256]

⁹⁸ supported by Forest & Bird [FS23.188] and MPHRCI [FS27.924], opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.062], NZFFA [FS9.213], R P Mansell; A J Mansell, & M R Mansell [FS26.050], Transpower [FS20.004], WIAL [FS31.013], Winstone Aggregates [FS8.013] and WWL [FS39.020]

⁹⁹ [S222.033] (supported by Forest & Bird [FS23.189] and MPHRCI [FS27.925], opposed in part by Transpower [FS20.005], opposed by NZFFA [FS9.214], WWL [FS39.010 and FS39.019]) and [S222.079] (supported by Forest & Bird [FS23.235] and MPHRCI [FS27.971], opposed in part by Transpower [FS20.012], opposed by NZFFA [FS9.260] and WWL [FS39.012])

Sub-issue(s)	Description of matters raised by submitters
	<p>Forest & Bird¹⁰⁰ seeks similar relief as EDS with regard to the inclusion of natural form and character, however suggests specific wording to amend the chapeau of both Objectives WH.O9 and P.O6, being “<i>Water quality, habitats, natural form and character, water quantity and ecological processes...</i>” Forest & Bird¹⁰¹ also seeks for Table 8.4 and 9.2 to be amended (or a new table added), however suggests a minimum acceptable ratio of the current condition to the reference condition of 1.0.</p> <p>Retain attributes from Table 3.4 EDS [S222.033] and [S222.079] and Forest & Bird [S261.061] and [S261.140] seek for the nuisance macrophytes, periphyton cover, mahinga kai, and toxicants attributes from Table 3.4 to be retained for Tables 8.4 and 9.2.</p> <p>Retain groundwater attributes from Table 3.6 EDS [S222.033] and [S222.079] and Forest & Bird [S261.061] and [S261.140] consider that groundwater targets are needed and seek for the groundwater targets from Table 3.6 to be retained for Tables 8.4 and 9.2.</p> <p>Set periphyton target of 120 mg Victoria University Canoe Club [S187.006] seeks for minimum periphyton targets in Table 8.4 to be amended to 120 mg, noting that a target of 200 mg is too high to protect values within catchments. Similarly, EDS [S222.033] and [S222.079] and Forest & Bird [S261.061] and [S261.140] seek for periphyton biomass minimum target states in Tables 8.4 and 9.2 to be set at a NPS-FM band of 120 mg chl-a for all part FMUs, with any higher targets to be retained.</p> <p>Strengthen nitrate toxicity targets EDS [S222.033] and [S222.079] and Forest & Bird [S261.061] and [S261.140] seek for the nitrate toxicity targets in Tables 8.4 and 9.2 to be amended to NPS-FM A band for all part FMUs.</p> <p>Strengthen DIN targets Victoria University Canoe Club [S187.006] seeks for DIN targets in Table 8.4 to be amended to a maximum of 1.0 mg/L, with targets ideally to be set at 0.3 mg/L.</p> <p>Fish and Game [S188.009]¹⁰² considers that aquatic ecosystem health depends on managing diffuse discharges of nutrients and E. coli from farming activities, noting if current land use inputs of nutrients are unknown, then more conservative limits will be needed to ensure target reductions are achieved. Fish and Game seeks for DIN concentrations to be set at 0.3-0.6 mg/L (citing Canning, et al 2021), as well as a monitoring programme to assess concentrations of nutrients throughout the catchment.</p> <p>EDS [S222.033] and [S222.079] and Forest & Bird [S261.061] and [S261.140] seek the following relief regarding DIN targets in Tables 8.4 and 9.2:</p> <ul style="list-style-type: none"> • Retain DIN targets where they are set below 0.3 mg/L • Amend DIN targets for good rivers (types 1 and 4) to 0.3 mg/L (median) • Amend DIN targets for medium rivers (types 2 and 3) to 0.6 mg/L • Amend DIN targets for poor rivers (types 5 and 6) to 1.0 mg/L • Minimum DIN targets to be no higher than 1.0 mg/L <p>Strengthen DRP targets Fish and Game [S188.009]¹⁰³ considers that aquatic ecosystem health depends on managing diffuse discharges of nutrients and E. coli from farming activities, noting if current land use inputs of nutrients are unknown, then more conservative limits will be needed to ensure target reductions are achieved. Fish and Game seeks for DRP concentrations to be set at 0.01-0.02 mg/L (citing Canning, et al 2021), as well as a monitoring programme to assess concentrations of nutrients throughout the catchment.</p> <p>Strengthen MCI targets EDS [S222.033] and [S222.079] and Forest & Bird [S261.061] and [S261.140] seek for higher targets to be set for MCI attributes in Tables 8.4 and 9.2.</p>

¹⁰⁰ [S261.060] (supported by MPHRCI [FS27.679], opposed in part by Transpower [FS20.021], opposed by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.032], Hort NZ [FS1.033 and FS1.059], NZFFA [FS9.387], R P Mansell; A J Mansell, & M R Mansell [FS26.016], WIAL [FS31.014] and WWL [FS39.022 and FS39.039]) and [S261.139] (supported by MPHRCI [FS27.758], opposed in part by Transpower [FS20.036], opposed by NZFFA [FS9.466], R P Mansell; A J Mansell, & M R Mansell [FS26.027] and WWL [FS39.026 and FS39.043])

¹⁰¹ [S261.061] (supported by MPHRCI [FS27.680], opposed in part by Transpower [FS20.022], opposed by NZFFA [FS9.388] and WWL [FS39.023 and FS39.040]) and [S261.140] (supported by MPHRCI [FS27.759], opposed in part by Transpower [FS20.037], opposed by NZFFA [FS9.467] and WWL [FS39.027 and FS39.044])

¹⁰² supported by Forest & Bird [FS23.1165], MPGC [FS21.014] and MPHRCI [FS27.1098], opposed by NZFFA [FS9.009] and WWL [FS39.270]

¹⁰³ supported by Forest & Bird [FS23.1165], MPGC [FS21.014] and MPHRCI [FS27.1098], opposed by NZFFA [FS9.009] and WWL [FS39.270]

Sub-issue(s)	Description of matters raised by submitters
	<p>Strengthen fish community health targets Pareraho Forest Trust [S213.014] (supported by MPHRCI [FS27.1041]) seeks for fish community health parameter for the Korokoro part-FMU to be amended from C to B, noting that Korokoro, Speedys and Dry Creek catchments are protected by GW Key Native Ecosystems (in part) for fish diversity and are important sites for improving threatened species diversity, condition and abundance.</p> <p>Add parameter for “swimmable days” Pat van Berkel [S282.013] supports Objective WH.O9 in part, however considers the objective is incomplete. Specifically, Pat van Berkel [S282.012] seeks for a new parameter for “swimmable days” to be added to Table 8.4 as it is easily understood to the public and encompasses all quality reasons for why a river may not be swimmable.</p> <p>Set environmental limits to achieve ecological health Porirua Harbour Trust & Guardians of Pāuatahanui Inlet [S176.002] seek for environmental limits to be set to achieve “ecological health” and other associated values such as recreation, amenity, and custodianship.</p> <p>Fish and Game¹⁰⁴ seeks for environmental outcomes to be set for ecosystem health value, and TAS set to allow for maintenance and/or restoration of this ecosystem health value, noting this may involve setting limits and bottom lines well above national bottom lines.</p> <p>Set TAS for all water bodies Fish and Game [S188.003]¹⁰⁵ seeks for TAS to be set for all water bodies, including estuaries, wetlands and groundwater, noting that TAS for wetlands have been excluded in PC1.</p>
Delete provisions / amend to decrease restrictiveness	<p>Extend timeframes John Easter [S17.013] considers the timeframes in Table 8.4 to be unrealistic and seeks for the timeframe to be determined by implementing intergenerational land use changes, suggesting that the replacement of the specified timeframe of 2040 with an indicative timeframe of 2100 may be achievable.</p> <p>WCC¹⁰⁶ seeks for the timeframes in Tables 8.4 and 9.2 to be amended from 2040 to 2060, noting that the proposed 2040 timeframe does not take into account the environmental and financial constraints of WCC and will be difficult to achieve, and that a 2060 timeframe is consistent with WCC’s spatial planning framework, the long-term plan and strategic financing of upgrades and expansions to the three waters network.</p> <p>Similarly, WWL¹⁰⁷ seeks for the timeframes in Tables 8.4 and 9.2 to be amended from 2040 to 2060, noting that the proposed 2040 timeframe will result in the requirement for a large proportion of sub-catchments (or possibly all of them) to be upgraded in the short term, rendering prioritisation of sub-catchment upgrades meaningless.</p> <p>HCC [S211.009]¹⁰⁸ seeks for the target state timeframes for E. coli and enterococci in Table 8.4 to be amended to 2060, as they consider the 2040 timeframe to be unaffordable. HCC considers that repairing the public network would only reduce a portion of the contaminant load, noting substantial costs to landowners to upgrade pipes within the private wastewater network to meet the proposed 2040 target. HCC raises concern with a lack of information on the achievability of TAS, and considers the funding requirements on housing and business development capacity is not sufficiently explored in the s32 evaluation.</p> <p>PCC [S240.003] (opposed by NZFFA [FS9.100]) opposes the 2040 E. coli target, raising concern that this will affect consenting for stormwater and wastewater discharges and noting the following:</p> <ul style="list-style-type: none"> • Notes some catchments will require a 90 percent reduction and considers this infeasible. • Concern that rates may increase by 12-14 percent per year for network upgrades to meet the 2040 target. • Considers a 2060 target of 6-7 percent is more achievable provided other funding avenues are explored, including significant central government funding. <p>PCC [S240.031]¹⁰⁹ seeks for the target state timeframes for E. coli and enterococci in Table 9.2 to be amended to 2060, raising similar concerns to HCC.</p>

¹⁰⁴ [S188.001] (supported by Forest & Bird [FS23.1157], MPGC [FS21.006], and MPHRCI [FS27.1090], opposed by NZFFA [FS9.001]) and [S188.002] (supported by Forest & Bird [FS23.1158], MPGC [FS21.007] and MPHRCI [FS27.1091], opposed by NZFFA [FS9.002])

¹⁰⁵ supported by Forest & Bird [FS23.1159], MPGC [FS21.008] and MPHRCI [FS27.1092], opposed by Kāinga Ora [FS45.071], NZFFA [FS9.003] and WWL [FS39.263]

¹⁰⁶ [S33.033] (supported by WWL [FS39.239]) and [S33.081] (supported by WWL [FS39.245])

¹⁰⁷ [S151.060] (opposed by Forest & Bird [FS23.1387]) and [S151.107] (supported by NZTA [FS28.167], opposed by Forest & Bird [FS23.1434])

¹⁰⁸ supported by Winstone Aggregates [FS8.030] and WWL [FS39.094], opposed by Forest & Bird [FS23.355]

¹⁰⁹ supported by WCC [FS36.015] and WWL [FS39.134], opposed by NZFFA [FS9.128]

Sub-issue(s)	Description of matters raised by submitters
	<p>Extend timeframe HCC¹¹⁰ seeks for the proposed E. coli target for 2040 to be amended to 2060, noting that repair and upgrading the public network would only reduce a proportion of the contaminant load and there will be substantial costs to landowners to upgrade pipes (private laterals) within the private wastewater network that make a significant portion of untreated discharges to land and water, to meet the proposed 2040 target. Notes WWL's concern in relation to the ability to deliver the work required to meet the 2040 target.</p> <p>WCC [S33.001] (supported by WWL [FS39.230]) notes funding constraints will make it difficult to achieve significant improvements quickly and considers the target attribute timeframe of 2040 to be unlikely to be achievable. WCC considers a 2060 target to be more realistic but would also be challenging due to financial constraints and limited capacity within the infrastructure sector to deliver upgrades.</p> <p>Timeframes for Makara catchment John Easter [S17.020] raises concern regarding the timeframes to achieve outcomes in the Makara catchment and considers generic figures in the plan change should be replaced with guidance notes.</p> <p>Withdraw due to lack of baseline data In 10 submission points, WWL¹¹¹ notes a lack of information relating to baseline states to measure against, meaning it is not possible to determine whether the TAS parameters and requirements are reasonable, appropriate and achievable. Consequently, WWL seeks the withdrawal of Tables 8.2 and 9.2 until further detail can be added, with further specific comments on particular TAS:</p> <p><u>Periphyton biomass</u></p> <ul style="list-style-type: none"> Notes periphyton biomass is dependent on a range of environmental and human factors including shading, nutrient concentrations and sedimentation rates, and that addressing these factors will require a process to identify the relevant factors and required actions further than those under WWL's control. Notes certain sites have a lack of data for the setting of baselines and there is uncertainty whether achieving the TAS by 2040 is realistic and achievable. Notes that natural conditions and land uses and activities within the catchment may prevent a TAS being achieved, including shading, stream bed type and channelisation. <p><u>E. coli</u></p> <ul style="list-style-type: none"> Notes there will be other forms of faecal bacteria contamination within catchments, e.g. rural inputs (managed through P.P20 & P.P24), on-site wastewater treatment and from birds or dogs. Seeks further analysis to determine whether improvements are achievable. <p><u>Fish community health</u></p> <ul style="list-style-type: none"> Notes the abundance and type of fish species is dependent on a range of environmental and human factors and, and that addressing these factors requires a process to identify the relevant factors and required actions further than those under WWL's control. Considers at all sites there is a lack of data for the setting of baselines and the required improvements may be unrealistic for these sites by 2040. Notes that natural conditions and land uses and activities within the catchment may prevent a TAS being achieved, including through invasive species, the temperature of watercourses, channelisation and barriers to fish passage. Notes that once any required improvements have been made to a catchment it can take a period of time for this to be observed in an improvement in fish abundance and diversity (Membrane (2022)). <p><u>Macroinvertebrates</u></p> <ul style="list-style-type: none"> Notes the abundance and diversity of macroinvertebrate species is dependent on a range of environmental and human factors and that addressing these factors will require a process to identify the relevant factors and required actions further than those under WWL's control. Notes that at some sites there is a lack of data for the setting of baselines and the required improvements may be unrealistic for these sites by 2040. Notes that natural conditions and human land uses and activities within the catchment may prevent a TAS being achieved and this could include through invasive species, the temperature of watercourses, channelisation and lack of habitat.

¹¹⁰ [S211.002] (supported by WWL [FS39.090], opposed by Forest & Bird [FS23.348]) and [S211.003] (supported by WCC [FS36.054] and WWL [FS39.091], opposed by Forest & Bird [FS23.349])

¹¹¹ [S151.060] (opposed by Forest & Bird [FS23.1387]); [S151.061] (supported by NZTA [FS28.134], opposed by Forest & Bird [FS23.1388]); [S151.062] (opposed by Forest & Bird [FS23.1389]); [S151.063] (supported by NZTA [FS28.135], opposed by Forest & Bird [FS23.1390]); [S151.064] (supported by NZTA [FS28.136], supported in part by Hort NZ [FS1.034], opposed by Forest & Bird [FS23.1391]); [S151.066] (opposed by Forest & Bird [FS23.1393]); [S151.067] (opposed by Forest & Bird [FS23.1394]); WWL [S151.068] (supported by NZTA [FS28.139], opposed by Forest & Bird [FS23.1395]); [S151.069] (supported by NZTA [FS28.138], opposed by Forest & Bird [FS23.1396]); and [S151.107] (supported by NZTA [FS28.167], opposed by Forest & Bird [FS23.1434])

Sub-issue(s)	Description of matters raised by submitters
	<ul style="list-style-type: none"> Notes that once any required improvements have been made to a catchment it can take a period of time for this to be observed in an improvement in macroinvertebrate abundance and diversity (Collier et al., 2002). <p><u>Dissolved oxygen</u></p> <ul style="list-style-type: none"> Considers there is a lack of data for the setting of baselines and the required improvements may be unrealistic for these sites by 2040. <p><u>Dissolved organic nitrogen/dissolved reactive phosphorus</u></p> <ul style="list-style-type: none"> Considers the assessment of the implications of the TAS requires input from a wide variety of stakeholders and additional assessment. <p><u>Dissolved copper/dissolved zinc</u></p> <ul style="list-style-type: none"> Considers the approach of Policy P.P9 does not recognise the other sources of zinc and copper outside of WWL’s control (e.g. zinc roofs, copper based brake disks). Considers the required changes will require an approach outside of WWL’s control that will take years and significant investment to enact, and may not have occurred by 2040. Notes the TAS is for dissolved copper and dissolved zinc can be more challenging to remove through stormwater treatment devices than total copper and total zinc. <p><u>Ecosystem metabolism</u></p> <ul style="list-style-type: none"> Notes that Table 8.4 states further monitoring is needed to define the baseline state and develop the attribute state framework. <p><u>Ammonia (toxicity)</u></p> <ul style="list-style-type: none"> Notes that external factors, such as activities and land use in the catchments may lead to failure of TAS outside of WWL’s control. <p><u>Nitrate (toxicity)</u></p> <ul style="list-style-type: none"> Notes that external factors, such as activities and land use in the catchments may lead to failure of TAS outside of WWL’s control. <p>Reflect meaningful progress and link huanga with Schedule B WWL¹¹² seeks for Clause (a) of both Objectives WH.O9 and P.O6 to be amended to refer to “meaningful progress” to reflect the length of time required to deliver improvements and for ecosystems to recover with the following wording:</p> <p><i>where a target attribute state in Table 8.4/9.2 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit so that the target attribute state is met within the timeframe indicated within Table 8.4/9.2, or meaningful progress has been made, and</i></p> <p>Additionally, WWL seeks for the huanga to be linked with Schedule B to provide certainty for applicants.</p> <p>Revise TAS in accordance with NPS-FM Clause 3.11(8) PF Olsen [S18.021, S18.044 and S18.045] considers the setting of the proposed TAS is not consistent with clause 3.11(8) of the NPS-FM and seeks for the TAS in Tables 8.4 and 9.2 to be revised accordingly, noting the following concerns:</p> <ul style="list-style-type: none"> A lack of due consideration given to the environmental outcomes, TAS of receiving environments, and connections between water bodies, as required by the clause. Questions the effectiveness of the proposed TAS and considers that they do not reflect an adequate understanding of environmental outcomes. Questions the use of freshwater accounting systems to inform the setting of TAS and emphasises the importance of accurate and up-to-date information. <p>Clarify Makara Stream targets as indicative John Easterher [S17.013] seeks for the targets for Makara Stream in Table 8.4 to be tagged as indicative/non-operative until the targets can be determined to represent sub-catchments at the confluences of major tributaries, raising concern regarding the reliance of a single monitoring support to support the provisions.</p>

¹¹² [S151.059] (supported by WCC [FS36.025], supported in part by Kāinga Ora [FS45.082], opposed by Forest & Bird [FS23.1386]) and [S151.106] (supported by WCC [FS36.031], supported in part by Kāinga Ora [FS45.083], opposed by Forest & Bird [FS23.1433])

Sub-issue(s)	Description of matters raised by submitters
	<p>Adjust to reflect good management CFG¹¹³ considers the requirement for attribute improvement in all river reaches if TAS is not met in part FMU monitoring sites does not reflect good management and seeks for Objectives WH.O9 and P.O6 to be adjusted as such. Considers a failure to meet TAS at a part FMU monitoring site should require identification of the problem source and focus on raising TAS performance in that area. Notes TAS in some sub-catchments may already be met and are not practicably able to be improved.</p> <p>Delete Clause (c) Winstone Aggregates [S206.034 and S206.062] seeks for Clause (c) to be deleted from each of Objectives WH.O9 and P.O6, noting the following concerns:</p> <ul style="list-style-type: none"> • That the proposed improvements may be too ambitious and unrealistic in the proposed timeframe. • That the requirement to move from the existing D state to B state for periphyton biomass; and from the existing C state to A state for E. coli will require significant land use change. • That Clause (c) is unrealistic and does not account for seasonal shifts in water quality and ecological condition, with no certainty of expectations. <p>Address gaps and uncertainties WFF¹¹⁴ seeks the following amendments for Objective WH.O9:</p> <ul style="list-style-type: none"> • Amend Clause (a) to read “<i>improve where the TAS is not met</i>” (delete “is met”) • Delete Clauses b) and c) • Add new clause which directs the collection of robust data for assessing baseline state and monitoring progress in all rivers within the part-FMUs <p>Additionally, WFF seeks the following amendments for Tables 8.4 and 9.2:</p> <ul style="list-style-type: none"> • Delete timeframes • Delete sites/attributes where baseline state is based on limited data or further monitoring is needed • Delete the columns titled “<i>part FMU default TAS</i>” • Amend NOF attributes to use NOF compliant metrics and statistics • Amend baseline state for monitored sites to use latest Council data (e.g. 2021/22 River Water Quality and Ecology Monitoring report)
Clarify metrics	<p>Identify river types within part-FMUs EDS [S222.033 and S222.079] and Forest & Bird [S261.061 and S261.140] seek for river types and classes to be stated for each part-FMU in Tables 8.4 and 9.2.</p> <p>Better define fish community health EDS [S222.033 and S222.079] and Forest & Bird [S261.061 and S261.140] seeks for fish community health to be defined as determined by experts, noting ambiguity on how it differs from IBI (Index of Biological Integrity).</p> <p>Clarify suspended and deposited fine sediment targets Regarding suspended fine sediment and deposited fine sediment targets, WWL [S151.065]¹¹⁵ raises the following concerns:</p> <ul style="list-style-type: none"> • That there is uncertainty in relation to the modelled correlation between sediment loads and visual clarity, noting that the adjustment of the national SedNet model to the scale of target TAS locations may lead to greater uncertainty. • That sediment loads, visual clarity and deposited sediment are influenced by factors within catchments outside of WWL’s control, including human land uses and activities and natural factors. <p>WWL consequently seeks for the consideration of all contributing sediment sources for setting TAS for visual clarity and deposited sediment with the following to be addressed:</p> <ul style="list-style-type: none"> • How sediment load reductions will be measured in the future • How would proportionate contribution to sediment be measured and any reduction in this contribution be measured • Other relief as may be required to address the issues identified, including relief that is alternative, additional or consequential. <p>Civil Contractors NZ [S285.016]¹¹⁶ raises the same concerns as WWL and seeks the same relief, with the addition of clarification on how much time testing would take and who a “suitable person” would be.</p>

¹¹³ [S288.044] (opposed by Forest & Bird [FS23.068]) and [S288.085] (opposed by Forest & Bird [FS23.109])

¹¹⁴ [S193.065] (opposed by Forest & Bird [FS23.1021]), [S193.066] (opposed by Forest & Bird [FS23.1022]) and [S193.118] (opposed by Forest & Bird [FS23.1074])

¹¹⁵ supported by NZTA [FS28.137], opposed by Forest & Bird [FS23.1392]

¹¹⁶ supported by Goodman Contractors [FS35.016], Multi Civil Contractors [FS49.016], NZTA [FS28.009] and PCL Contracting [FS32.007]

Sub-issue(s)	Description of matters raised by submitters
	<p>Clarify application of dissolved metals Stormwater360¹¹⁷ notes the TAS in Tables 8.4 and 9.2 refer to dissolved metals whereas Schedule 28 refers only to the percentage of copper or zinc to be removed, suggests consistency through the rules policies and seeks the following relief:</p> <ul style="list-style-type: none"> • Define speciation throughout stormwater rules to achieve TAS defined in Table 8.4. • Table 1 and 2 of Schedule 28: Stormwater Contaminant Treatment should reflect dissolved metals. <p>Confirm natural sources of brown water NZFFA Wellington [S36.037] notes the use of the suspended fine sediment/visual clarity/black disc test for the Mangaora River does not take into account that the Black Stream (natural brown water) drains into the Mangaroa River, and that the total suspended solids and suspended fine sediment and deposited fine sediment results are high quality and therefore inconsistent with the visual clarity result (as noted in their original submission). Consequently, NZFFA Wellington seeks the following relief:</p> <ul style="list-style-type: none"> • Confirmation that different TAS have been set where there are natural sources of brown water • Check Wainuiomata/Black Creek has appropriate TAS set for visual clarity.
<p>Provide guidance on proportional contribution</p>	<p>WWL¹¹⁸ seeks guidance on how proportional contributions from WWL’s network (particularly E. coli, suspended fine sediment/deposited fine sediment, dissolved oxygen, ammonia toxicity and nitrate toxicity) will be measured against other sources within the catchment.</p> <p>More broadly, WWL [S151.007]¹¹⁹ opposes the TAS, raising the following:</p> <ul style="list-style-type: none"> • Acknowledges the need for improvements or reductions that are commensurate with, or proportionate to, the effects of the relevant discharge on the attribute state of the receiving environment. • Concerned that as worded, the requirements are ambiguous, as it is not clear whether they mean a reduction in contaminant load that reflects the effect of the discharge on the receiving environment (which would require modelling/technical assessment), or a percentage reduction in all cases that reflects the percentage difference between the TAS and the baseline state of the receiving environment. Considers the second interpretation may be onerous where it does not reflect the actual contribution of the relevant discharge, while the first interpretation would require WWL to acquire information or assessment tools that are not currently available. • Notes that WWL does not currently have access to the data or analytical tools required to assess the correlation between contaminant load from a pipe and contaminant concentrations in the receiving environment, but is able to model the contaminant load (e.g. total kilograms of copper and zinc from the stormwater network). Notes concentrations in the receiving environment is dependent on factors such as stream flows and ocean currents (which affect dilution and therefore concentration). • Subject to the targets being realistic, supports PC1 including clear targets for load reductions in the discharge, rather than unclear formulas such as “commensurate”. • Considers what is realistically achievable through stormwater network discharge mitigations is not reflected by the proposed references (in other parts of PC1) to reductions “commensurate to achieving” the TAS, which would suggest that WWL needs to reduce copper by more than 15 percent for the TAS to be achieved. • Seeks clarification on what actions were considered to be realistically achievable through stormwater network discharge mitigations (noting it is not clear from Greer, 2023). • Notes that consideration of the extent to which discharge load contributes to achieving TAS; and the extent to which this is within WWL’s control, is needed for determining targets for load reductions. Notes the analysis has not yet been undertaken for stormwater catchments beyond Porirua or for E. coli or enterococci in relation to wastewater, and that the “commensurate reductions” wording in PC1 is not supported until this has been undertaken and WWL considers the outcomes reasonable. • Considers it is not realistic to require confirmation of load reduction targets as part of the application documentation, noting that at most, this could be determined at the sub-catchment planning stage, with the high level strategies required under Schedules 31 and 32 instead specifying the intended methodology or approach for determining this. • Considers these assessments will require state of the environment information and/or modelling that is not available to WWL. Notes expectation that GWRC will be producing the modelling necessary for WWL to determine the appropriate (or “commensurate”) load reduction targets. • Considers there are additional complexities in ascertaining the contribution of dry weather overflows and exfiltration to achieving the TAS, as discharges can be from a private cross connection that are not a matter within WWL’s control. Seeks that rather than a requirement to reduce dry weather overflows and exfiltration to contribute to meeting the TAS, they be subject to a separate “responsive management” programme. <p>Similarly, Civil Contractors NZ [S285.016] seeks clarification on how proportionate contribution to sediment any reduction in this contribution will be measured.</p>

¹¹⁷ [S31.003] (supported by NZTA [FS28.112], opposed by The Fuel Companies [FS33.007]) and [S31.005] (supported by NZTA [FS28.111])

¹¹⁸ [S151.060] (opposed by Forest & Bird [FS23.1387]); [S151.062] (opposed by Forest & Bird [FS23.1389]); [S151.065] (supported by NZTA [FS28.137], opposed by Forest & Bird [FS23.1392]); [S151.066] (opposed by Forest & Bird [FS23.1393]); [S151.070] (opposed by Forest & Bird [FS23.1397]); [S151.071] (opposed by Forest & Bird [FS23.1398]); and [S151.107] (supported by NZTA [FS28.167], opposed by Forest & Bird [FS23.1434])

¹¹⁹ supported by NZTA [FS28.127], opposed by Forest & Bird [FS23.1334]

Issue 14: Mapping

Sub-issue(s)	Description of matters raised by submitters
Map 77	<p>General support Forest & Bird [S261.254] (supported by MPHRCI [FS27.873], opposed by NZFFA [FS9.581]) considers the maps assist with plan interpretation and seeks for them to be retained as notified.</p> <p>Yvonne Weeber [S183.403] (supported by MPHRCI [FS27.403]) and Guardians of the Bays [S186.191] (supported by MPHRCI [FS27.614]) support Map 77, with no reasons stated or specific relief sought.</p> <p>Amend riverine environments to reflect Schedule F1 Transpower [S177.079] (opposed by Forest & Bird [FS23.822]) and Ara Poutama [S248.080] seek for the riverine environments described in Map 77 to be amended to accurately reflect the habitat extents covered by Schedule F1, noting these do not align with actual river extents and that plan users will rely on the mapping to interpret spatial application of Schedule F1.</p> <p>Improve map usability Woodridge [S255.103] considers the mapping is not of a large enough scale to determine boundaries relative to property boundaries, and seeks for maps to be provided in the style of district plan online maps.</p>
Map 78	<p>General support Forest & Bird [S261.255] (supported by MPHRCI [FS27.874], opposed by NZFFA [FS9.582]) considers the maps assist with plan interpretation and seeks for them to be retained as notified.</p> <p>Yvonne Weeber [S183.404] (supported by MPHRCI [FS27.404]) supports Map 78, with no reasons stated or specific relief sought.</p> <p>Consequential changes WFF [S193.192] (opposed by Forest & Bird [FS23.1148]) seeks for Map 78 to be amended to be consistent with their relief sought on the objectives and to show catchments, as well as any consequential amendments as necessary.</p> <p>Improve map usability Woodridge [S255.104] considers the mapping is not of a large enough scale to determine boundaries relative to property boundaries, and seeks for maps to be provided in the style of district plan online maps.</p>
Map 79	<p>General support Yvonne Weeber [S183.405] (supported by MPHRCI [FS27.405]) and Guardians of the Bays [S186.192] (supported by MPHRCI [FS27.615]) support Map 79, with no reasons stated or specific relief sought.</p> <p>Pareraho Forest Trust [S213.029] supports the inclusion of Speedys Stream and Dry Creek in the Korokoro part-FMU, and seek for Map 79 to be retained as notified.</p> <p>Forest & Bird [S261.256] (supported by MPHRCI [FS27.875], opposed by NZFFA [FS9.583]) considers the maps assist with plan interpretation and seeks for them to be retained as notified.</p> <p>Amend FMU boundaries CentrePort [S93.010] raises concern with the mapping of the management units and questions whether there are errors, and seek the following relief:</p> <ul style="list-style-type: none"> • Amendment of the boundary of the Wellington urban FMU to accurately reflect the extent of land at Centre Port's container wharf, and to ensure that there is not overlap with the coastal water management unit. • Removal of the Wellington urban FMU from wharves and apply the 'Te Whanganui-a-Tara harbour and estuaries' coastal water management unit to these areas. • Alternatively, if the mapping extent is not erroneous, provision of an explanation for the unit boundary and the discrepancy between map layers. <p>Consequential changes WFF [S193.193] (opposed by Forest & Bird [FS23.1149]) seeks for Map 79 to be amended to be consistent with their relief sought on the objectives and to show catchments, as well as any consequential amendments as necessary.</p>

Sub-issue(s)	Description of matters raised by submitters
	<p>Improve map usability Woodridge [S255.105] considers the mapping is not of a large enough scale to determine boundaries relative to property boundaries, and seeks for maps to be provided in the style of district plan online maps.</p>
Map 80	<p>General support Yvonne Weeber [S183.406] (supported by MPHRCI [FS27.406]) and Guardians of the Bays [S186.193] (supported by MPHRCI [FS27.616]) support Map 80, with no reasons stated or specific relief sought.</p> <p>Forest & Bird [S261.257] (supported by MPHRCI [FS27.876], opposed by NZFFA [FS9.584]) considers the maps assist with plan interpretation and seeks for them to be retained as notified.</p> <p>Consequential changes WFF [S193.194] (opposed by Forest & Bird [FS23.1150]) seeks for Map 80 to be amended to be consistent with their relief sought on the objectives and to show catchments, as well as any consequential amendments as necessary.</p> <p>Improve map usability Woodridge [S255.106] considers the mapping is not of a large enough scale to determine boundaries relative to property boundaries, and seeks for maps to be provided in the style of district plan online maps.</p>
Map 82	<p>General support Yvonne Weeber [S183.408] (supported by MPHRCI [FS27.408]) supports Map 82, with no reasons stated or decision sought.</p> <p>Forest & Bird [S261.259] (supported by MPHRCI [FS27.878], opposed by NZFFA [FS9.586]) considers the maps assist with plan interpretation and seeks for them to be retained as notified.</p> <p>Amend FMU boundaries CentrePort [S93.011] considers that the Wellington Urban FMU should apply to land and that the Te Whanganui-a-Tara harbour and estuaries management unit should apply to the CMA, seeking the following relief:</p> <ul style="list-style-type: none"> • Amend the boundary of the Te Whanganui-a-Tara harbour and estuaries' unit to accurately reflect the extent of coastal marine area adjacent to CentrePort's container wharf, and to ensure there is no overlap with the Wellington urban FMU. • Remove the Wellington urban FMU from wharves and apply the Te Whanganui-a-Tara harbour and estuaries coastal water management unit to these areas. • Alternatively, if the mapping extent is not erroneous, provide clear and reasoned explanation for the unit boundaries and the discrepancy between map layers. <p>Improve map usability Woodridge [S255.108] considers the mapping is not of a large enough scale to determine boundaries relative to property boundaries, and seeks for maps to be provided in the style of district plan online maps.</p>
Map 83	<p>General support Yvonne Weeber [S183.409] (supported by MPHRCI [FS27.409]) and Guardians of the Bays [S186.194] (supported by MPHRCI [FS27.617]) support Map 83, with no reasons stated or decision sought.</p> <p>Forest & Bird [S261.260] (supported by MPHRCI [FS27.879], opposed by NZFFA [FS9.587]) considers the maps assist with plan interpretation and seeks for them to be retained as notified.</p> <p>Improve map usability Woodridge [S255.109] considers the mapping is not of a large enough scale to determine boundaries relative to property boundaries, and seeks for maps to be provided in the style of district plan online maps.</p>
Map 84	<p>General support Yvonne Weeber [S183.410] (supported by MPHRCI [FS27.410]) supports Map 84, with no reasons stated or decision sought.</p> <p>Forest & Bird [S261.261] (supported by MPHRCI [FS27.880], opposed by NZFFA [FS9.588]) considers the maps assist with plan interpretation and seeks for them to be retained as notified.</p> <p>Improve map usability Woodridge [S255.110] considers the mapping is not of a large enough scale to determine boundaries relative to property boundaries, and seeks for maps to be provided in the style of district plan online maps.</p>

Sub-issue(s)	Description of matters raised by submitters
Map 85	<p>General support Yvonne Weeber [S183.411] (supported by MPHRCI [FS27.411]) and Guardians of the Bays [S186.195] (supported by MPHRCI [FS27.618]) support Map 85, with no reasons stated or decision sought.</p> <p>Forest & Bird [S261.262] (supported by MPHRCI [FS27.881], opposed by NZFFA [FS9.589]) considers the maps assist with plan interpretation and seeks for them to be retained as notified.</p> <p>Improve map usability Woodridge [S255.111] considers the mapping is not of a large enough scale to determine boundaries relative to property boundaries, and seeks for maps to be provided in the style of district plan online maps.</p> <p>Add “Whakatikei River at Hutt Confluence” Pat van Berkel [S282.020] (supported by Donald Skerman [FS3.011]) notes that Map 85 omits the primary contact site “Whakatikei River at Hutt Confluence” and seeks for it to be added, as well as to a text list of the definition of “primary contact sites”.</p>
New maps	WIAL ¹²⁰ seeks the insertion of new maps which clearly identify all whitua, including both coastal and landward areas, to ensure consistent interpretation and application of objectives, policies and rules.

Issue 15: Not applicable to whitua

Sub-issue(s)	Description of matters raised by submitters
Objective O2	<p>General support Yvonne Weeber [S183.056] (supported by MPHRCI [FS27.056]) supports Objective O2, with no reasons stated or decision sought.</p> <p>Retain application to whitua WIAL [S101.018] (supported by Meridian [FS47.132], opposed by Forest & Bird [FS23.1271]) considers Objective O2 is reasonably broad and gives effect to Part 2 of the RMA. WIAL opposes the exclusion of the provisions as it relates to Whitua Te Whanganui-a-Tara and seeks for the application of Objective O2 to the whitua to be retained.</p> <p>WWL [S151.031] (supported by Meridian [FS47.133], opposed by Forest & Bird [FS23.1358]) consider the benefits in Objective O2 should be recognised in all locations, and seeks for the application of Objective O2 to be retained in all locations. Civil Contractors NZ [S285.012]¹²¹ supports WWL’s submission, seeking the same relief.</p> <p>WFF [S193.029] (supported by Hort NZ [FS1.011], supported by Meridian [FS47.134], opposed by Forest & Bird [FS23.985]) considers Objective O2 is relevant to all whitua, and seeks that it is retained as such.</p>
Objective O5	<p>General support Yvonne Weeber [S183.057] (supported by MPHRCI [FS27.057]) supports Objective O5, with no reasons stated or decision sought.</p> <p>Retain application to whitua WWL [S151.032] (supported by Hort NZ [FS1.012], opposed by Forest & Bird [FS23.1359]) considers Objective O5 is important for source protection of source water and seeks for the application of the objective to be retained in all locations.</p> <p>WFF [S193.030] (opposed by Forest & Bird [FS23.986]) considers Objective O5 is relevant to all whitua and seeks that it is retained as such.</p>
Objective O6	<p>General support Yvonne Weeber [S183.058] (supported by MPHRCI [FS27.058]) supports Objective O6, with no reasons stated or decision sought.</p> <p>Retain application to whitua WFF [S193.031]¹²² considers Objective O6 is relevant to all whitua and seeks that it is retained as such.</p>

¹²⁰ [S101.011] (opposed by Forest & Bird [FS23.1264]) and [S101.017] (opposed by Forest & Bird [FS23.1270], with a neutral/not stated stance from Woodridge [FS16.039])

¹²¹ supported by Goodman Contractors [FS35.012], supported by Meridian [FS47.135], supported by Multi Civil Contractors [FS49.012]

¹²² supported by Hort NZ [FS1.013] and Meridian [FS47.137], opposed by Forest & Bird [FS23.987]

Sub-issue(s)	Description of matters raised by submitters
Objective O17	Yvonne Weeber [S183.059] (supported by MPHRCI [FS27.059]) supports Objective O17, with no reasons stated or decision sought.
Objective O18	<p>General support Sofia Holloway [S13.001] seeks for Objective O18 to be retained as notified.</p> <p>Yvonne Weeber [S183.066] (supported by MPHRCI [FS27.066]) and Fish and Game [S188.018]¹²³ support Objective O18, with no reasons stated or decision sought.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.013] supports the intent of Objective O18 and seeks that it is retained as notified.</p> <p>Retain application to whitua Should WIAL's [S101.023] (opposed by Forest & Bird [FS23.1276]) relief requested for Objective WH.O3 not be accepted, they seek for the deletion of the proposed note for Objective O18 which excludes the application of the objective and Tables 3.1-3.33 in Whitua Te Whanganui-a-Tara.</p> <p>WWL [S151.034] (opposed by Forest & Bird [FS23.1361]) seeks for the retention of the application of Objective O18 to all water bodies in all locations/whaitua while further detail on TAS is developed.</p> <p>Amend for consistency of Māori customary use PF Olsen [S18.011] notes that the NPS-FM recognises Māori customary uses as a significant attribute and seeks for Objective O18 to be amended to recognise this uniformly across the region.</p>
Objective O19	<p>General support Guildford Timber, Silverstream Forest and Goodwin Estate [S210.014] supports the intent of Objective O19 and seeks that it is retained as notified.</p> <p>Concern with 2050 date Heather Blissett [S45.003] considers 2050 is not a reasonable date in the absence of any other date due to the sensitivity of water systems.</p> <p>Retain water quality parameters Forest & Bird [S261.027]¹²⁴ considers the water quality parameters in Table 3.4 remain relevant to the whitua and seeks for the parameters to be carried through to the new tables, referring to their relief sought on Table 3.4 and for new tables in the new whitua chapters.</p> <p>Retain application to whitua Should WIAL's relief sought on the provisions of Chapter 8 not be accepted, WIAL [S101.024] (opposed by Forest & Bird [FS23.1277]) opposes the note that excludes the application of Objective O19 (and associated Tables 3.7 and 3.8) to Whitua Te Whanganui-a-Tara, and seeks its deletion.</p> <p>WWL [S151.038] (supported in part by WIAL [FS31.001], opposed by Forest & Bird [FS23.1365]) seeks for the application of Objective O19 to be retained for all water bodies in all locations/whaitua while further detail on TAS is developed.</p>
Objective O20	Yvonne Weeber [S183.060] (supported by MPHRCI [FS27.060]) supports Objective O20, with no reasons stated or decision sought.
Objective O25	<p>General support Lynn Cadenhead [S22.014] seeks for Objective O25 to be retained as notified, with no reasons stated.</p> <p>Yvonne Weeber [S183.076] (supported by MPHRCI [FS27.076]) and Guardians of the Bays [S186.030] (supported by MPHRCI [FS27.453]) support Objective O25, with no reasons stated or decision sought.</p> <p>EDS [S222.011]¹²⁵ support Objective O25 and consider it protects ecosystem and indigenous biodiversity health, with no decision sought.</p> <p>Retain application to whitua WWL [S151.044] (opposed by Forest & Bird [FS23.1371]) opposes the note which excludes Tables 3.4, 3.5, 3.6 and 3.8 from Whitua Te Whanganui-a-tara and Te Awarua-o-Porirua, and seeks its deletion.</p>

¹²³ supported by Forest & Bird [FS23.1174], MPGC [FS21.023] and MPHRCI [FS27.1107], opposed by NZFFA [FS9.018]

¹²⁴ supported by MPHRCI [FS27.646], opposed by NZFFA [FS9.354] and WWL [FS39.051]

¹²⁵ supported by Forest & Bird [FS23.167], supported by MPHRCI [FS27.903], opposed by NZFFA [FS9.192]

Sub-issue(s)	Description of matters raised by submitters
	<p>Include references to Tables 3.1 and 3.3 Guildford Timber, Silverstream Forest and Goodwin Estate [S210.015] seeks for Objective O25 to be amended to include references to Tables 3.1 and 3.3.</p>
Objective O28	<p>General support Lynn Cadenhead [S22.015] seeks for Objective O28 to be retained as notified, with no reasons stated.</p> <p>Yvonne Weeber [S183.077] (supported by MPHRCI [FS27.077]) and Guardians of the Bays [S186.031] (supported by MPHRCI [FS27.454]) support Objective O28, with no reasons stated or decision sought.</p> <p>EDS [S222.012]¹²⁶ support Objective O28 and consider it protects ecosystem and indigenous biodiversity health, with no decision sought.</p> <p>Retain application to whitua WWL [S151.045] (opposed by Forest & Bird [FS23.1372]) opposes the note which excludes Tables 3.4, 3.5, 3.6 and 3.8 from Whitua Te Whanganui-a-tara and Te Awarua-o-Porirua, and seeks its deletion.</p> <p>Should WIAL's [S101.025] (opposed by Forest & Bird [FS23.1278]) relief sought for Chapter 8 of the NRP not be accepted, they seek for the deletion of the proposed amendments to the Note in Objective O28 which exclude the application of the objective and Tables 3.7 and 3.8 in Whitua Te Whanganui-a-Tara.</p> <p>Include references to Tables 3.1 and 3.3 Guildford Timber, Silverstream Forest and Goodwin Estate [S210.016] seek for Objective O28 to be amended to include references to Tables 3.1 and 3.3.</p>
Objective O34	<p>General support Yvonne Weeber [S183.061] (supported by MPHRCI [FS27.061]) supports Objective O34, with no reasons stated or decision sought.</p> <p>Retain application to whitua Should WIAL's relief sought on the provisions of Chapter 8 not be accepted, WIAL [S101.019] (opposed by Forest & Bird [FS23.1272]) opposes the exclusion of Objective O34 as it relates to Whitua Te Whanganui-a-Tara and seeks for its application to be retained.</p>
Objective O35	<p>General support Yvonne Weeber [S183.062] (supported by MPHRCI [FS27.062]) supports Objective O34, with no reasons stated or decision sought.</p> <p>Retain application to whitua WFF [S193.032] (opposed by Forest & Bird [FS23.988]) considers Objective O35 is relevant to all whitua and seeks that it is retained as such.</p>
Objective O36	<p>General support Yvonne Weeber [S183.063] (supported by MPHRCI [FS27.063]) supports Objective O36, with no reasons stated or decision sought.</p> <p>Retain application to whitua Should WIAL's relief sought on the provisions of Chapter 8 not be accepted, WIAL [S101.020] (opposed by Forest & Bird [FS23.1273]) opposes the exclusion of Objective O36 as it relates to Whitua Te Whanganui-a-Tara and seeks for its application to be retained.</p>
Objective O37	<p>General support Yvonne Weeber [S183.064] (supported by MPHRCI [FS27.064]) supports objective O37, with no reasons stated or decision sought.</p> <p>Retain application to whitua Should WIAL's relief sought on the provisions of Chapter 8 not be accepted, WIAL [S101.021] (opposed by Forest & Bird [FS23.1274]) opposes the exclusion of Objective O37 as it relates to Whitua Te Whanganui-a-Tara and seeks for its application to be retained.</p>
Objective O38	<p>General support Yvonne Weeber [S183.065] (supported by MPHRCI [FS27.065]) supports Objective O38, with no reasons stated or decision sought.</p>

¹²⁶ supported by Forest & Bird [FS23.168] and MPHRCI [FS27.904], opposed by NZFFA [FS9.193]

Sub-issue(s)	Description of matters raised by submitters
	<p>Retain application to whitua Should WIAL's relief sought on the provisions of Chapter 8 not be accepted, WIAL [S101.022] (opposed by Forest & Bird [FS23.1275]) opposes the exclusion of Objective O38 as it relates to Whitua Te Whanganui-a-Tara and seeks for its application to be retained.</p>
Table 3.1	<p>General support Yvonne Weeber [S183.067] (supported by MPHRCI [FS27.067]) supports Table 3.1, with no reasons stated or decision sought.</p> <p>Retain application to whitua WWL [S151.035] (opposed by Forest & Bird [FS23.1362]) seeks for the application of Table 3.1 to be retained for all water bodies in all locations/whaitua while further detail on TAS is developed.</p>
Table 3.2	<p>General support Yvonne Weeber [S183.068] (supported by MPHRCI [FS27.068]) supports Table 3.2, with no reasons stated or decision sought.</p> <p>Retain application to whitua WWL [S151.036] (opposed by Forest & Bird [FS23.1363]) seeks for the application of Table 3.2 to be retained for all water bodies in all locations/whaitua while further detail on TAS is developed.</p>
Table 3.3	<p>General support Yvonne Weeber [S183.069] (supported by MPHRCI [FS27.069]) supports Table 3.3, with no reasons stated or decision sought.</p> <p>Retain application to whitua WWL [S151.037] (opposed by Forest & Bird [FS23.1364]) seeks for the application of Table 3.3 to be retained for all water bodies in all locations/whaitua while further detail on TAS is developed.</p>
Table 3.4	<p>Retain water quality parameters EDS [S222.008]¹²⁷ and Forest & Bird [S261.028]¹²⁸ seek consider the water quality parameters in Table 3.4 remain relevant to the whitua and seek for the application of nuisance macrophytes, periphyton cover, toxicants and mahinga kai targets to be retained for the new whitua chapters.</p> <p>Retain application to whitua WWL [S151.039] (opposed by Forest & Bird [FS23.1366]) seeks for the application of Table 3.4 to be retained for all water bodies in all locations/whaitua while further detail on TAS is developed.</p>
Table 3.5	<p>General support Yvonne Weeber [S183.072] (supported by MPHRCI [FS27.072]) and Guardians of the Bays [S186.025] (supported by MPHRCI [FS27.448]) support Table 3.5, with no reasons stated or decision sought.</p> <p>Retain application to whitua WWL [S151.040] (opposed by Forest & Bird [FS23.1367]) seeks for the application of Table 3.5 to be retained for all water bodies in all locations/whaitua while further detail on TAS is developed.</p>
Table 3.6	<p>General support Yvonne Weeber [S183.073] (supported by MPHRCI [FS27.073]) and Guardians of the Bays [S186.026] (supported by MPHRCI [FS27.449]) support Table 3.6, with no reasons stated or decision sought.</p> <p>Retain application to whitua WWL [S151.041] (opposed by Forest & Bird [FS23.1368]) seeks for the application of Table 3.6 to be retained for all water bodies in all locations/whaitua while further detail on TAS is developed.</p> <p>EDS [S222.009]¹²⁹ seeks for the application of Table 3.6 to the whitua to be retained, noting that no replacement targets have been provided for the whitua. Forest & Bird [S261.029]¹³⁰ also seek for Table 3.6 to be retained for the whitua given that no replacement targets have been provided, and further seek amendments to include a nitrate-nitrogen target of <1.0 mg/L.</p>

¹²⁷ supported by Forest & Bird [FS23.164] and MPHRCI [FS27.900], opposed by NZFFA [FS9.189]

¹²⁸ supported by MPHRCI [FS27.647], opposed by NZFFA [FS9.355] and WWL [FS39.052]

¹²⁹ supported by Forest & Bird [FS23.165] and MPHRCI [FS27.901], opposed by NZFFA [FS9.190]

¹³⁰ supported by MPHRCI [FS27.648], opposed by NZFFA [FS9.356] and WWL [FS39.053]

Sub-issue(s)	Description of matters raised by submitters
Table 3.7	<p>General support Yvonne Weeber [S183.074] (supported by MPHRCI [FS27.074]) and Guardians of the Bays [S186.027] (supported by MPHRCI [FS27.450]) support Table 3.7, with no reasons stated or decision sought.</p> <p>Restore mauri of wetlands Heather Blissett [S45.007] questions if it is intended to restore the mauri of wetlands which are affected by human actions, seeking for the restoration of wetlands to what is known of the ecosystem rather than using a measure from the date that wetlands were destroyed by humans.</p> <p>Retain application to whitua WWL [S151.042] (opposed by Forest & Bird [FS23.1369]) seeks for the application of Table 3.7 to be retained for all water bodies in all locations/whaitua while further detail on TAS is developed.</p> <p>EDS [S222.010]¹³¹ seeks for the application of Table 3.7 to the whitua to be retained, noting that no replacement targets have been provided for the whitua. Forest & Bird [S261.030]¹³² also seek for Table 3.7 to be retained for the whitua given that no replacement targets have been provided, as well as the addition of the wetland condition index as a measure of wetland ecosystem health and a target set of 10</p>
Table 3.8	<p>General support Yvonne Weeber [S183.075] (supported by MPHRCI [FS27.075]) and Guardians of the Bays [S186.028] (supported by MPHRCI [FS27.451]) support Table 3.8, with no reasons stated or decision sought.</p> <p>Retain application to whitua WWL [S151.043] (opposed by Forest & Bird [FS23.1370]) seeks for the application of Table 3.8 to be retained for all water bodies in all locations/whaitua while further detail on TAS is developed.</p> <p>Forest & Bird [S261.031]¹³³ considers the key parameters of Table 3.8 remain relevant to the whitua, and seeks either for the retention of attributes contained in Table 3.8 but which are not included in Tables 8.1 or 9.1, or to be carried through to the new tables, to give effect to the NPS-FM and NZCPS.</p>

¹³¹ supported by Forest & Bird [FS23.166] and MPHRCI [FS27.902], opposed by NZFFA [FS9.191]

¹³² supported by MPHRCI [FS27.649], opposed by NZFFA [FS9.357] and WWL [FS39.054]

¹³³ supported by MPHRCI [FS27.650], opposed by NZFFA [FS9.358] and WWL [FS39.055]

Appendix 2.1: Submission points allocated to multiple sub-issues

Submission point	Submitter name	Issue	Sub-issues
S151.054	Wellington Water Ltd	Issue 4: Objective WH.O1 (freshwater bodies and CMA wai ora by 2100)	<ul style="list-style-type: none"> Extend timeframe Clarify status of note
S193.056	Wairarapa Federated Farmers	Issue 4: Objective WH.O1 (freshwater bodies and CMA wai ora by 2100)	<ul style="list-style-type: none"> Delete/amend requirement for planted margins (second bullet) Provide for primary production
S206.032	Winstone Aggregates	Issue 4: Objective WH.O1 (freshwater bodies and CMA wai ora by 2100)	<ul style="list-style-type: none"> Clarity where Āhua is to be restored (first bullet) Delete/amend requirement for planted margins (second bullet)
S211.006	Hutt City Council	Issue 4: Objective WH.O1 (freshwater bodies and CMA wai ora by 2100)	<ul style="list-style-type: none"> Delete “Note” Delete/amend requirement for planted margins (second bullet)
S222.022	Environmental Defence Society Inc	Issue 4: Objective WH.O1 (freshwater bodies and CMA wai ora by 2100)	<ul style="list-style-type: none"> Shorten timeframe Delete “Note”
S257.010	Kāinga Ora – Homes and Communities	Issue 4: Objective WH.O1 (freshwater bodies and CMA wai ora by 2100)	<ul style="list-style-type: none"> Extend timeframe Consequential changes Align with NPS-FM
S261.049	Forest & Bird	Issue 4: Objective WH.O1 (freshwater bodies and CMA wai ora by 2100)	<ul style="list-style-type: none"> Shorten timeframe Include reference to ephemeral watercourses Delete “Note”
S286.018	Taranaki Whānui	Issue 4: Objective WH.O1 (freshwater bodies and CMA wai ora by 2100)	<ul style="list-style-type: none"> Delete “Note” Provide for customary practices throughout whole catchment (fifth bullet)
S151.055	Wellington Water Ltd	Issue 6: Objective WH.O2 (groundwater, rivers and natural wetlands towards wai ora by 2040)	<ul style="list-style-type: none"> Extend timeframe Clarify status of note
S193.057	Wairarapa Federated Farmers	Issue 6: Objective WH.O2 (groundwater, rivers and natural wetlands towards wai ora by 2040)	<ul style="list-style-type: none"> Delete or clarify first bullet Delete/amend “natural state” Delete or reword fourth bullet Provide for primary production Provide for reduction of harbour sedimentation
S222.023	Environmental Defence Society Inc	Issue 6: Objective WH.O2 (groundwater, rivers and natural wetlands towards wai ora by 2040)	<ul style="list-style-type: none"> Shorten timeframe Delete “note”
S101.040	Wellington International Airport Limited	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> Delete “note” Delete/amend “natural state”
S151.003	Wellington Water Ltd	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> General oppose
		Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> General oppose
S151.004	Wellington Water Ltd	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> General oppose
		Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> General oppose
S151.056	Wellington Water Ltd	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> Consequential changes Align with NPS-FM Extend timeframe
S151.103	Wellington Water Ltd	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> Include reference to ephemeral watercourses Shorten timeframe Delete “note” Amend to clarify “ripples” (fourth bullet)

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Submission point	Submitter name	Issue	Sub-issues
S193.059	Wairarapa Federated Farmers	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> • General support • Extend timeframe • Delete/amend Clause (b) • Clarify Clauses (f) and (g)
S193.114	Wairarapa Federated Farmers	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> • Extend timeframe • Delete/amend Clause (b) • Add priority contact recreation sites to Clause (g) • Add clause for primary production
S193.115	Wairarapa Federated Farmers	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> • Shorten timeframe • Include reference to natural form and character (Clause (a))
S222.025	Environmental Defence Society Inc	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> • Shorten timeframe • Include reference to ephemeral watercourses (chapeau) • Include reference to natural form and character (Clause (a))
S222.078	Environmental Defence Society Inc	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> • Delete/amend Clause (b) • Delete Clause (d) • Delete Clause (f) • Delete Clause (g) • Provide for primary production
S261.052	Forest & Bird	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> • Shorten timeframe • Include reference to natural form and character in Clause (a)
S261.136	Forest & Bird	Issue 8: Objectives WH.O3 and P.O3 and Tables 8.1 and 9.1 (coastal water objectives)	<ul style="list-style-type: none"> • Extend timeframe • Link to TAS and locations
S151.101	Wellington Water Ltd	Issue 5: Objective P.O1 (groundwater, rivers, lakes, natural wetlands, estuaries, harbours and CMA wai ora by 2100)	<ul style="list-style-type: none"> • Shorten timeframe • Include reference to ephemeral watercourses • Include reference to natural form and character in Clause (a)
S193.112	Wairarapa Federated Farmers	Issue 5: Objective P.O1 (groundwater, rivers, lakes, natural wetlands, estuaries, harbours and CMA wai ora by 2100)	<ul style="list-style-type: none"> • Review applicability to critical infrastructure • Clarify “health and wellbeing” (chapeau)
S222.075	Environmental Defence Society Inc	Issue 5: Objective P.O1 (groundwater, rivers, lakes, natural wetlands, estuaries, harbours and CMA wai ora by 2100)	<ul style="list-style-type: none"> • Delete/extend timeframe • Provide further detail on baseline states and required timeframes • Amend “or improved” (chapeau) • Define “high contaminant concentrations” and provide maps (Clause (b)) • Clarify Clauses (g) and (h)
S240.024	Porirua City Council	Issue 5: Objective P.O1 (groundwater, rivers, lakes, natural wetlands, estuaries, harbours and CMA wai ora by 2100)	<ul style="list-style-type: none"> • Delete/extend timeframe • Provide further detail on baseline states and required timeframes • Amend “or improved” (chapeau) • Define “high contaminant concentrations” and provide maps (Clause (b)) • Clarify Clauses (g) and (h)
S257.039	Kāinga Ora – Homes and Communities	Issue 5: Objective P.O1 (groundwater, rivers, lakes, natural wetlands, estuaries, harbours and CMA wai ora by 2100)	<ul style="list-style-type: none"> • Delete/extend timeframe • Add column for measured baseline state • Amend numeric targets to “maintain or improve”
S261.133	Forest & Bird	Issue 5: Objective P.O1 (groundwater, rivers, lakes, natural wetlands, estuaries, harbours and CMA wai ora by 2100)	<ul style="list-style-type: none"> • Amend “or improved” (chapeau) • Add clause directing collection of robust baseline data
S193.113	Wairarapa Federated Farmers	Issue 7: Objective P.O2 (groundwater, rivers, lakes and natural wetlands towards wai ora by 2040)	<ul style="list-style-type: none"> • Delete/extend timeframe • Add column for measured baseline state • Amend numeric targets to “maintain or improve”
S222.076	Environmental Defence Society Inc	Issue 7: Objective P.O2 (groundwater, rivers, lakes and natural wetlands towards wai ora by 2040)	<ul style="list-style-type: none"> • Shorten timeframe / set interim targets • Include parameter for turbidity

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Submission point	Submitter name	Issue	Sub-issues
			<ul style="list-style-type: none"> Add parameters for narrative objectives Amend wai tai / open coast unit for enterococci
S240.025	Porirua City Council	Issue 7: Objective P.O2 (groundwater, rivers, lakes and natural wetlands towards wai ora by 2040)	<ul style="list-style-type: none"> Shorten timeframe / set interim targets Include parameter for turbidity Add parameters for narrative objectives Amend wai tai / open coast unit for enterococci
S261.134	Forest & Bird	Issue 7: Objective P.O2 (groundwater, rivers, lakes and natural wetlands towards wai ora by 2040)	<ul style="list-style-type: none"> Shorten timeframe / set interim targets Include parameter for turbidity Add parameters for narrative objectives Amend wai tai / open coast unit for enterococci
S261.050	Forest & Bird	Issue 7: Objective WH.O2 (groundwater, rivers and natural wetlands towards wai ora by 2040)	<ul style="list-style-type: none"> Shorten timeframe / set interim targets Include parameter for turbidity Add parameters for narrative objectives Amend wai tai / open coast unit for enterococci
S222.028	Environmental Defence Society Inc	Issue 9: Objective WH.O5 (Parangarahu Lakes and associated natural wetlands towards wai ora by 2040) and Table 8.2 (target attribute states for lakes)	<ul style="list-style-type: none"> Shorten timeframe Carry over Table 3.5 attributes
S261.055	Forest & Bird	Issue 9: Objective WH.O5 (Parangarahu Lakes and associated natural wetlands towards wai ora by 2040) and Table 8.2 (target attribute states for lakes)	<ul style="list-style-type: none"> Shorten timeframe Carry over Table 3.5 attributes
S282.010	Pat van Berkel	Issue 12: Objective WH.O8 and Table 8.3 (primary contact site objectives)	<ul style="list-style-type: none"> Amend “protect” to “maintain” (Clauses (b) and (c)) Clarify aquitard collapses and aquifer consolidation
S282.011	Pat van Berkel	Issue 12: Objective WH.O8 and Table 8.3 (primary contact site objectives)	<ul style="list-style-type: none"> Amend “protect” to “maintain” (Clauses (b) and (c)) Amend to avoid or minimise aquifer consolidation (Clause (f))
S206.033	Winstone Aggregates	Issue 10: Objectives WH.O6 and WH.O7 (groundwater and aquitards)	<ul style="list-style-type: none"> Amend “protect” to “maintain” (Clauses (b) and (c)) Amend to avoid or minimise aquifer consolidation (Clause (f))
S210.022	Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust	Issue 10: Objectives WH.O6 and WH.O7 (groundwater and aquitards)	<ul style="list-style-type: none"> Clarify chapeau Address risk to dogs
S217.004	R P Mansell; A J Mansell, & M R Mansell	Issue 10: Objectives WH.O6 and WH.O7 (groundwater and aquitards)	<ul style="list-style-type: none"> Add parameter for “swimmable days” Add parameter for benthic cyanobacteria or cyanobacteria blooms
S151.060	Wellington Water Ltd	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Delete provisions / amend to decrease restrictiveness - Withdraw due to lack of baseline data Delete provisions / amend to decrease restrictiveness - Extend timeframes Provide guidance on proportional contribution
S151.065	Wellington Water Ltd	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Clarify metrics - Clarify suspended and deposited fine sediment targets Provide guidance on proportional contribution
S151.107	Wellington Water Ltd	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Delete provisions / amend to decrease restrictiveness - Withdraw due to lack of baseline data Delete provisions / amend to decrease restrictiveness - Extend timeframes Provide guidance on proportional contribution
S17.013	John Easter	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Delete provisions / amend to decrease restrictiveness - Clarify Makara Stream targets as indicative Delete provisions / amend to decrease restrictiveness - Extend timeframes
S176.002	Porirua Harbour Trust & Guardians of Pāuatahanui Inlet	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Shorten timeframes / include interim milestones Set environmental limits to achieve ecological health

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Submission point	Submitter name	Issue	Sub-issues
S187.006	Victoria University Canoe Club	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Strengthen provisions - Set periphyton target of 120 mg Strengthen provisions - Strengthen DIN targets
S188.009	Wellington Fish and Game Regional Council	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Strengthen provisions - Strengthen DIN targets Strengthen provisions - Strengthen DRP targets
S222.033	Environmental Defence Society Inc	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Strengthen provisions - Include natural form and character Strengthen provisions - Retain attributes from Table 3.4 Strengthen provisions - Retain groundwater attributes from Table 3.6 Strengthen provisions - Set periphyton target of 120 mg Strengthen provisions - Strengthen nitrate toxicity targets Strengthen provisions - Strengthen DIN targets Strengthen provisions - Strengthen MCI targets Strengthen provisions - Shorten timeframes Clarify metrics - Identify river types within part-FMUs Clarify metrics - Better define fish community health
S222.079	Environmental Defence Society Inc	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Strengthen provisions - Include natural form and character Strengthen provisions - Retain attributes from Table 3.4 Strengthen provisions - Retain groundwater attributes from Table 3.6 Strengthen provisions - Set periphyton target of 120 mg Strengthen provisions - Strengthen nitrate toxicity targets Strengthen provisions - Strengthen DIN targets Strengthen provisions - Strengthen MCI targets Strengthen provisions - Shorten timeframes Clarify metrics - Identify river types within part-FMUs Clarify metrics - Better define fish community health
S261.061	Forest & Bird	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Strengthen provisions - Include natural form and character Strengthen provisions - Retain attributes from Table 3.4 Strengthen provisions - Retain groundwater attributes from Table 3.6 Strengthen provisions - Set periphyton target of 120 mg Strengthen provisions - Strengthen nitrate toxicity targets Strengthen provisions - Strengthen DIN targets Strengthen provisions - Strengthen MCI targets Strengthen provisions - Shorten timeframes Clarify metrics - Identify river types within part-FMUs Clarify metrics - Better define fish community health
S261.140	Forest & Bird	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Strengthen provisions - Include natural form and character Strengthen provisions - Retain attributes from Table 3.4 Strengthen provisions - Retain groundwater attributes from Table 3.6 Strengthen provisions - Set periphyton target of 120 mg Strengthen provisions - Strengthen nitrate toxicity targets Strengthen provisions - Strengthen DIN targets Strengthen provisions - Strengthen MCI targets Strengthen provisions - Shorten timeframes Clarify metrics - Identify river types within part-FMUs Clarify metrics - Better define fish community health
S285.016	Civil Contractors New Zealand	Issue 13: Objectives WH.O9 and P.O6 and Tables 8.4 and 9.2 (target attribute states for rivers)	<ul style="list-style-type: none"> Extend timeframe Clarify status of note