

Before the Proposed Plan Change One Hearings Panel In Wellington

Under the Resource Management Act 1991 (the Act)

In the matter of the Proposed Plan Change One to the Natural Resources Plan
– Hearing Stream 2: Objectives and Ecosystem Health Policies

Between **Greater Wellington Regional Council**
Local authority

And **Wellington Water Limited**
Submitter 151 and Further Submitter FS039

Statement of evidence of Paula Margaret Hunter for Wellington Water Limited

Planning

Dated 14 March 2025

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Statement of Evidence of Paula Margaret Hunter

1 Introduction

- 1.1 My full name is Paula Margaret Hunter.
- 1.2 I am the Technical Director for Planning at Stantec. Stantec is a multidisciplinary professional services consultancy. I have been employed in my current role at Stantec and its legacy consultancies since 1996.
- 1.3 This evidence focuses on the provisions of Plan Change 1 ('**PC1**') that relate to planning and their implications for Wellington Water as the three waters service provider on behalf of its client councils.
- 1.4 I have been engaged by Wellington Water Limited to give this evidence.

2 Qualifications and Experience

- 2.1 I hold a Bachelor of Arts in Geography from the University of Canterbury (1982), and a Diploma of Town Planning from the University of Auckland (1983). I am an accredited RMA Decision Maker. I am a Fellow of the New Zealand Planning Institute; a former President of that professional body and have been awarded a Distinguished Service Award by the Institute. I am an accredited independent hearings commissioner.
- 2.2 I have over 35 years' experience in the field of planning and resource management. I have extensive experience in the preparation of regional and district plans. Over many years I have been involved in preparing submissions and presenting evidence on behalf of territorial authorities and Watercare on regional policy statements and regional plans and plan changes.
- 2.3 From 2013 to 2016 I was a member of the Auckland Unitary Plan Independent Hearing Panel. The Panel made significant changes to the Unitary Plan to provide a more integrated and coherent strategy for the management of the region. I was responsible for the redrafting of the Freshwater Systems and Coastal Water, Freshwater and Geothermal Water sections of the Regional Policy Statement and the Water Quality and Integrated Management and Water Quantity, Allocation and Use sections of the Regional Plan. I also worked with the Panel's planning team on improving the structure and usability of the Unitary Plan, ensuring clear vertical and horizontal alignment, and developing best practice drafting approaches.

- 2.4 I have been supporting Wellington Water since 2017 with the preparation of the Wastewater Network Overflow resource consent applications. This has included the design of the overall approach to the consent and the preparation of the application documentation. I was also a reviewer the Wellington Water's global stormwater resource consent application.
- 2.5 I have extensive experience in the consenting of municipal wastewater schemes. The relevant projects and my role in these projects are as follows:
- a Palmerston North City Council BPO Review Wastewater Consenting Project – Planning Lead.
 - b Hamilton City Council Wastewater Consents Project – Planning Lead.
 - c Tauranga City Council Wastewater Consents Project – Planning Lead.
 - d Hastings District Council Wastewater Consents Project – Planning Lead.
 - e Whangarei District Council Ruakaka Wastewater Consents Project, Planning Lead.
 - f Waikato District Council Ngaruawahia and Huntly Wastewater Schemes Consents Project, Planning Lead.
 - g Otorohanga District Council Otorohanga Wastewater Consents Project, Planning Lead.
 - h Waipa District Council Cambridge Wastewater Consents Project, Planning Lead.
- 2.6 I was also a member of the technical team of Stantec, GHD and Beca providing technical advice to Taumata Arowai on the national wastewater environmental performance standards.

3 Code of Conduct

- 3.1 Although this matter is not before the Environment Court, I confirm that I have read the 'Code of Conduct for Expert Witnesses' in the Environment Court Practice Note 2023.
- 3.2 I have complied with the Code in the preparation of this evidence and will follow it when presenting evidence at the hearing.
- 3.3 The data, information, facts and assumptions I have considered in forming my opinions are set out in my evidence to follow. The reasons for the opinions expressed are also set out in my evidence to follow.

- 3.4 Unless I state otherwise, my evidence is within my sphere of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

4 Scope of evidence

- 4.1 My evidence addresses the following:
- a Context for Wellington Water's submission.
 - b Overview of Wellington Water's submission as it relates to the PC1 objectives and ecosystem health and water quality policies.
 - c Response to s42A officer's report.
 - e Conclusion.
- 4.2 In preparing this evidence I have relied on the following documents:
- a PC1 as publicly notified.
 - b Operative Natural Resource Plan (**NRP**).
 - c s42A officer's report and supporting technical documents.
 - d Wellington Water's Wastewater Network Overflow resource consent applications and the Global Stormwater resource consent application.

5 Summary

- 5.1 Wellington Water has three (Hutt Valley, Porirua¹ and Wellington) wet weather wastewater network overflow consent applications and a "global" stormwater discharge consent application currently lodged with the Greater Wellington Regional Council (**GWRC**). There are challenges with achieving a viable consenting pathway for these applications under the operative Natural Resources Plan (**NRP**). It is hoped that Plan Change 1 (**PC1**) will assist in addressing these challenges.
- 5.2 Wastewater network overflows and stormwater discharges will happen regardless of whether they are consented or not. They cannot be turned off, they will continue and cannot be eliminated. This is why a workable framework that recognises the reality of what happens with wastewater network overflows and stormwater discharges needs to be incorporated into PC1.
- 5.3 The focus of Wellington Water's submission as it relates to Hearing Stream 2 is primarily on the workability of the Target Attribute States (**TAS**) and Coastal Water Objectives (**CWO**) in a resource consenting process and in particular their

¹ Including Northern Wellington.

application to intermittent discharges such as wastewater network overflows and stormwater discharges. In my view, the TAS and CWO provisions do not recognise the complexities and practicalities in determining the contribution an intermittent discharge makes to not achieving the TAS and CWO and in turn the level of improvement required in a wastewater network or stormwater system to achieve the TAS and CWO. These are matters that will be dealt with in more detail in Hearing Stream 4.

- 5.4 The main changes Wellington Water is seeking to the objectives and ecosystem health policies and that I support and my responses the s42A report relate to:
- a Removal from the list of provisions that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua of key objectives that assist in recognising the benefits of wastewater and stormwater networks and enable their ongoing operation and development.
 - b Retention of various objectives (Objectives O18, O19, O25, O28) until the issues with the TAS and CWO provisions are addressed and proven to be workable in consenting processes for wastewater network overflow and stormwater discharges.
 - c Provision of additional information to understand the implications of the objectives, policies and tables relating to TAS and CWO for the consenting, planning and operation of the wastewater and stormwater networks.
 - d Support for amendments that recognise that water is able to be used for social and economic use benefits, and recommend that the public health benefits should also be recognised.
 - e Support in principle for the inclusion of provisions that provide guidance on prioritisation of improvements to wastewater and stormwater networks. However, I consider these provisions should be included as a plan method rather than being embedded in a plan objective.
 - f The inclusion of a new objective requiring that by 2030 there is no further decline of the health and wellbeing of Te Whanganui-a-Tara's lakes and rivers is not supported. Given the scale of planning, design, works and funding required, applicants for "global" wastewater network overflow and stormwater discharge consents and would find it very challenging to demonstrate alignment with these objectives in five years time. The ability to meet this objective will also be influenced by matters outside Wellington Water's control such as increased extreme wet weather events due to climate change, private wastewater connections and intensification and greenfield growth.
- 5.5 In my view PC1 is critical to obtaining viable long term consents for the discharges from the stormwater networks and the wastewater network overflows that Wellington Water manages on behalf of its client councils. These discharges need to be regulated, but in a way that recognises that these discharges occur and will continue to occur. PC1 should provide a workable consenting framework which enables the consents to be granted with a "roadmap" over the life of the

consent (35 years) that achieves progressive environmental improvements and minimises risks.

6 Context for Wellington Water's submission

- 6.1 Given its focus on the management of wastewater and stormwater, PC1 has material implications for Wellington Water's operational and consenting processes.
- 6.2 In particular, Wellington Water has three (Hutt Valley, Porirua² and Wellington) wet weather wastewater network overflow consent applications and a "global" stormwater discharge consent application currently lodged with the GWRC. There are challenges with achieving a viable consenting pathway for these applications under the operative NRP. It is hoped that PC1 will assist in addressing these challenges.
- 6.3 Consequently, this evidence has been prepared through the lens of how to put in place a framework for the management of wastewater network overflows and stormwater discharges that is workable, enables these discharges are able to be consented, and achieves progressive environmental improvements and minimises risks over time.
- 6.4 It is important to note that wastewater network overflows and stormwater discharges will happen regardless of whether they are consented or not. They cannot be turned off, they will continue and cannot be eliminated. This is why a workable framework that recognises the reality of what happens with wastewater network overflows and stormwater discharges is required.
- 6.5 In terms of wastewater network overflows, Taumata Arowai in its discussion document on proposed national wastewater environmental standards has recognised that wastewater network overflows are 'inevitable', the need to regulate overflows and to provide an enabling consenting pathway to achieve this. It is proposing that wastewater network overflows be classified as controlled activities³ and a risk-based approach be adopted, that gives network operators the tools to prioritise addressing overflows based on the risk, impact and likelihood of overflows, within their means.
- 6.6 While this proposal is only at the discussion document stage and as yet has no legal status, I consider it represents clear recognition at the national level of the

² Including Northern Wellington.

³ The Local Government (Water Services) Bill proposes to amend the Water Services Act and Resource Management Act to allow Taumata Arowai to set resource consent activity status, for activities performance in accordance with the standards. Subject to enactment, the Authority is proposing to make all overflows from wastewater networks a controlled activity as part of the wastewater standard.

need to both regulate network overflows and provide a viable consenting pathway for doing so. In the event that the standards are confirmed as proposed in the discussion document, then they would override some aspects of the NRP.

7 Overview of Wellington Water's submission

- 7.1 The focus of Wellington Water's submission as it relates to Hearing Stream 2 is primarily on the workability of the TAS and CWO in a resource consenting process and in particular their application to intermittent discharges such as wastewater network overflows and stormwater discharges. Wellington Water is concerned about the lack of information relating to baseline states. The absence of reliable information makes it difficult to determine what improvements will be measured against. Without a clearly defined baseline state it is not possible for Wellington Water to determine whether the TAS parameters and requirements are appropriate and achievable.
- 7.2 In my view, the TAS and CWO provisions do not recognise the complexities and practicalities in determining the contribution an intermittent discharge makes to not achieving the TAS and CWO and in turn the level of improvement required in a wastewater network or stormwater system to achieve the TAS and CWO. I consider that the contribution to meeting TAS and CWO should not be the sole responsibility of Wellington Water and its client councils as there are other factors within catchments which Wellington Water has no control over that influence water quality and ecosystem health. Sources of contaminants need to be understood before determining who needs to make improvements and by how much. These issues will be addressed in detail in Hearing Stream 4 which deals with the policies and rules specific to wastewater network overflows and stormwater discharges.
- 7.3 It is acknowledged that the s42A report proposes a number of amendments and additions to the TAS and CWO tables. Given the complicated nature of these provisions, I understand Wellington Water is not in a position at this time to determine the implications of these changes and as such I am unable to provide a meaningful response to the amendments. They will be addressed in Hearing Stream 4.
- 7.4 Given the concerns about the complexity and workability of the provisions relating to TAS and CWO Wellington Water's submission did not support the notified version of the objectives and associated tables relating to TAS and CWO. Consequently, Wellington Water's submission sought a number of amendments

to these objectives to reflect its position. These are discussed further in section 8 of this evidence.

- 7.5 I note that, since lodging its written submission, Wellington Water has made a decision not to actively pursue some aspects of the relief sought in relation the TAS and CWOs, and timeframes for achieving them (with those matters to instead be addressed by its client councils). I understand the reasons for this will be addressed in Wellington Water representations at the hearing.
- 7.6 The other key component of Wellington Water's submission as it relates to Hearing Stream 2 is the need to include objectives that recognise the benefits of wastewater and stormwater networks and to enable their ongoing operation and development. These objectives are discussed further in section 8 of this evidence.

8 Recommended changes to relevant objectives

- 8.1 This section of my evidence outlines the key changes I recommend to PC1 in order to address the concerns in Wellington Water's submission and responds to the proposed changes to the objectives recommended in the s42A report. **Appendix A** to this evidence sets out the detail of the proposed changes sought by Wellington Water and responses to the s42A report.
- 8.2 Wellington Water amendments shown as ~~strikethrough~~ for deletion and underlining for additional text. GWRC amendments shown as ~~strikethrough~~ for deletion and underlining for additional text.
- 8.3 Where the Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua objectives are the same I have only reproduced the Te Whanganui-a-Tara objective.

Beneficial use and development - Objectives O5, O6

- 8.4 Objective O5 of the NRP (which is reproduced below) is included in the list of provisions that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua.

Objective O5

Sufficient fresh water of a suitable quality is available, for:

- (a) the health needs of people, and*
- (b) the reasonable needs of livestock.*

- 8.5 Wellington Water is seeking that Objective O5 be retained as it is important to the source protection of drinking water. The s42A report recommends that this submission point be rejected.
- 8.6 I disagree with the recommendation of the s42A report. Having an available, reliable and safe source of freshwater for municipal supply is fundamental to the functioning of urban environments and an objective that supports this. Objective O5 should apply to each Whaitua section.
- 8.7 Objective O6 of the NRP (which is set out below) is also included in the list of provisions that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua.

Objective O6

The social, economic, cultural and environmental benefits of taking and using water are recognised, when managing water.

- 8.8 Wellington Water is seeking that Objective O6 be retained and amended to specifically recognise and provide for the benefits of managing stormwater and the need to dispose / discharge wastewater to the environment. The s42A report is silent on this submission point.
- 8.9 The amendments sought by Wellington Water to Objective O6 are as follows:

Objective O6

The social, economic, cultural and environmental benefits of:

- (a) ~~taking and using water are recognised, when managing water.~~*
- (b) managing stormwater for the safety of people and property*
- (c) disposing of wastewater to achieve public health outcomes*
- are recognised and provided for when managing water.*

- 8.10 I support the application of Objective O6 to the Whaitua sections of the NRP and the amendments sought by Wellington Water. There needs to be an anchor in the Whaitua objectives that supports the cascade of policies and rules that are specific to stormwater network and wastewater networks. The inclusion of this objective and the amendments as proposed provide the first step in establishing an enabling consenting pathway for the granting of consent for discharges from these networks.

Objectives O18, O19, O25, O28

- 8.11 Wellington Water is seeking that these objectives continue to apply to rivers, lakes, groundwater or coastal water within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua until the issues with the TAS and CWO as set out in section 7 of this evidence are addressed and they are proven to be workable in consenting processes for wastewater network overflow and stormwater discharges. In my view this is a standard approach to maintain the status quo until issues with new provisions can be resolved.

Note associated with Objectives WH.O2 and P.O2

- 8.12 The s42A report is recommending the inclusion of the following note that will apply to Objectives WH.O2 and Objectives P.O2.

Note: Objectives WH.O2 to WH.O9 set out what is needed to achieve progressive implementation of this long-term objective up to 2040. Therefore, resource consent applicants do not need to demonstrate their proposed activities align with this objective.

- 8.13 The inclusion of this note is supported in principle as it may somewhat simplify the consenting process.

Objectives WH.O1, WH.O2 and P.O1, P.O2

- 8.14 The s42A report is recommending the inclusion of the following as a new wai ora state in Objectives WH.O1 and P.O1 and new clause (i) in Objectives WH.O2 and P.O2.

Water is able to be used for social and economic use benefits, provided that the health and well-being of waterbodies, freshwater ecosystems and coastal waters is not compromised.

(i) People and communities can provide for social and economic use benefits, provided that the health and well-being of waterbodies and ecosystems is not compromised.

- 8.15 The inclusion of these new provisions is supported. However, it is recommended that the provisions be amended to include “public health” as well as social and economic benefits. It is important to recognise the public health benefits of being able to take water for municipal supply and to discharge wastewater from wastewater treatment plants and from the networks. The ability to collect, convey, treat and discharge wastewater has critical public health benefits and the ability for networks to overflow due to heavy rainfall events or blockages provides a safety valve that can prevent wastewater discharging to private property or toilets surcharging. The inclusion of new note discussed in paragraphs 8.12 and 8.13

means however, that resource consent applicants do not need to demonstrate their proposed activities align with these provisions in terms of WH.O1 and P.O1.

Objective WH.O9 and P.O6

- 8.16 The s42A report is recommending the inclusion of the following new clause (d) in Objectives WH.O9 and P.O6.

(d) where improvements are required to existing wastewater or stormwater networks:

(i) prioritise E. coli/enterococci reductions that contribute to achieving the targets for primary contact site locations in Table 8.3, ahead of coastal targets in Table 8.1A and then the broader part Freshwater Management Unit E. coli targets in Table 8.4.

(ii) prioritise dissolved copper and dissolved zinc reductions in locations where macroinvertebrate target attribute state(s) in Table 8.4 are not met once the priorities in clause (i) above have been addressed.

- 8.17 The inclusion of provisions on prioritisation of improvements to wastewater and stormwater networks are supported in principle. I understand Wellington Water is still considering the practical implications of this direction and wishes to address it further in the context of Hearing Stream 4 (which deals with a number of other provisions that go to prioritisation, and these should be considered as a package).

- 8.18 However, I recommend that the prioritisation be included as a plan method rather than being embedded in a plan objective. Also, the method should be drafted as guidance to enable some flexibility in the prioritisation. This is because due to factors such as operational requirements the priorities list in clause (d) may not result in the efficient planning, development and funding of infrastructure. For example, improvements made at the bottom of a wastewater catchment may need to be upgraded or replaced due to capacity issues because of later upstream improvements resulting in greater volumes of wastewater in the network being conveyed to the bottom of the catchment.

- 8.19 While I consider guidance on prioritisation of improvements to wastewater and stormwater networks to be helpful, this needs to be considered against the background that all TAS are intended to be met in 15 years time.

- 8.20 Wellington Water sought the following amendment to clause (a) of Objectives WH.O9 and P.O6:

(a) where a target attribute state in Table 8.4 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 or meaningful progress has been made,

- 8.21 On the basis that the s42A report has not changed the 2040 date, the inclusion of this amendment becomes of much greater importance if the TAS has to be met in 15 years time.
- 8.22 I support the intent of the proposed amendment but suggest that “or meaningful progress has been made” be replaced “or ongoing progress towards meeting the target has been demonstrated.” to provide greater clarity.
- 8.23 I also recommend (this can be addressed in Hearing Stream 4) that Schedule 31: Stormwater Management Strategy and Schedule 32: Wastewater Network Catchment Improvement Strategy be amended to include a requirement to the effect that where the timeframe indicated within Table 8.4 cannot not be met an alternative timeline for when a TAS will be met shall be included in the Strategies.

Objective WH.10 and Objective P.07

- 8.24 The s42A report is recommending the inclusion of the following new objectives WH.10 and P.07

Objective WH.10

By 2030, there is no further decline of the health and wellbeing of Te Whanganui-a-Tara’s lakes and rivers.

- 8.25 The explanation for the inclusion of the new objective is that it is intended to establish a ‘no further decline’ imperative by 2030 in line with the 10 year interim targets required by the NPS-FM.
- 8.26 The question in my mind is how these new objectives will be applied in practice. For example, in terms of wastewater network overflows and stormwater discharges will the “no further decline” be measured on a Whaitua basis, a FMU basis a part FMU basis or a discharge by discharge basis.
- 8.27 Given the scale of works and funding required, applicants for “global” wastewater network overflow and stormwater discharge consents and would find it very challenging to demonstrate alignment with these objectives in five years time. This timeframe would be less if applications were considered 2026 or later.
- 8.28 The nature of wastewater networks and how they operate means that improvement works at the top of a catchment may result in an increase in downstream effects of overflows as more wastewater is collected and conveyed through the network. In these circumstances it may not be possible to demonstrate alignment with “no further decline”.
- 8.29 The ability to meet this objective will also be influenced by matters outside Wellington Water’s control such as increased extreme wet weather events due to climate change, private wastewater connections and intensification and greenfield growth.

9 Recommended changes to relevant ecosystem health and water quality policies

- 9.1 This section of my evidence outlines the key changes sought to the PC1 ecosystem health and water quality policies by Wellington Water and responds to the proposed changes to the policies recommended in the s42A report. **Appendix B** to this evidence sets out the detail of the proposed changes sought by Wellington Water and my responses to the s42A report.
- 9.2 Wellington Water amendments shown as ~~striketrough~~ for deletion and underlining for additional text. GWRC amendments shown as ~~striketrough~~ for deletion and underlining for additional text.
- 9.3 As the Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua polices are the same I have only reproduced the Te Whanganui-a-Tara policy.

Policies WH.P4, P.P4 and Tables 8.5 and 9.5

- 9.4 For similar reasons to those set out in paragraphs 7.1 to 7.4 of this evidence, Wellington Water requires additional information to understand the implications of these policies and tables for the consenting, planning and operation of the wastewater and stormwater networks. This additional information includes:
- a A detailed assessment of the implications of the TAS provisions on a sub-catchment basis to determine appropriateness of the requirements (in the context of a 2040 timeframe), and implications for sub-catchment prioritisation.
 - b How sediment load reductions will be measured in the future.
 - c How would proportionate contribution to sediment be measured and any reduction in this contribution be measured.
 - d Further assessments to address the uncertainty regarding the modelled correlation between sediment loads and visual clarity
- 9.5 Until Wellington Water has an understanding of the above matters, I am not in a position to support these provisions or to provide an informed response to the s42A report with any suggested amendments. These matters will be addressed further in Hearing Stream 4.

10 Conclusions

- 10.1 In my view PC1 is critical to obtaining viable long term consents for the discharges from the stormwater networks and the wastewater network overflows that Wellington Water manages on behalf of its client councils. These discharges need to be regulated, but in a way that recognises these discharges occur and will continue to occur. PC1 should provide a workable consenting framework

which enables the consents to be granted with a “roadmap” over the life of the consent (35 years) that achieves progressive environmental improvements and minimises risks.

Paula Margaret Hunter

14 March 2025

Appendix A Amendments to objectives sought by Wellington Water, GWRC response and Wellington Water's position

Wellington Water amendments shown as ~~strikethrough~~ for deletion and underlining for additional text.

GWRC amendments shown as ~~strikethrough~~ for deletion and underlining for additional text.

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
<p>3.1 Ki uta ki tai: mountains to the sea Objective O2 The importance and contribution of air, land, water and ecosystems to the social, economic and cultural well-being and health of people and the community are recognised in the management of those resources.</p>	<p>This objective is included in the list of provisions that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua.</p> <p>Wellington Water is seeking that Objective O2 be retained as these benefits should be recognised regardless of location.</p>	Accept	Support
<p>3.2 Beneficial use and development Objective O5 Sufficient fresh water of a suitable quality is available, for: (a) the health needs of people, and (b) the reasonable needs of livestock.</p>	<p>This objective is included in the list of provisions that will no longer apply to Whaitua Te Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua.</p> <p>Wellington Water is seeking that Objective O5 be retained as this is important to source protection of drinking water.</p>	Reject	Oppose for the reasons set out in paragraphs 8.4 to 8.6 of this evidence.
<p>3.2 Beneficial use and development Objective O6</p>	<p>This objective is included in the list of provisions that will no longer apply to Whaitua Te</p>	No response	Oppose for the reasons set out in paragraphs 8.7 to 8.10 of this evidence.

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
<p>The social, economic, cultural and environmental benefits of:</p> <ul style="list-style-type: none"> taking and using water are recognised managing stormwater for the safety of people and property disposing of wastewater to achieve public health outcomes <p>are recognised and provided for when managing water.</p> <p>Objective O9</p> <p>The social, economic, cultural and environmental benefits of Regionally Significant Infrastructure, renewable energy generation activities and the utilisation of mineral resources are recognized and provided for.</p>	<p>Whanganui-a-Tara or Te Awarua-o-Porirua Whaitua.</p> <p>Wellington Water considers more specific objective and policy support is required in PC1 to ensure that the NRP gives effect to these aspects of national and regional policy direction, and for consistency with Objective O10 of the NRP, specifically in relation to wastewater infrastructure.</p>		
<p>3.6 Water quality</p> <p>Objective O18</p> <p>Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use, including by:</p> <p>(a) maintaining water quality, or</p> <p>(b) improving water quality in:</p> <p>(i) significant contact recreation freshwater bodies and sites with significant mana whenua values identified in Schedule C and Ngā</p>	<p>Wellington Water is seeking the O18 continues to apply to rivers, lakes, groundwater or coastal water within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua while further detail on TASs is developed.</p> <p>This relates to Wellington Water opposing in full the provisions in the Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua</p>	<p>Reject</p>	<p>Oppose for the reasons set out in paragraph 8.11 of this evidence.</p>

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
<p>Taonga Nui a Kiwa identified in Schedule B to meet, as a minimum and within reasonable timeframes, the primary contact recreation objectives in Table 3.1, and</p> <p>(ii) coastal water and sites with significant mana whenua values identified in Schedule C and Ngā Taonga Nui a Kiwa identified in Schedule B to meet, as a minimum and within reasonable timeframes, the contact recreation objectives in Table 3.3, and</p> <p>(iii) all other rivers and lakes and natural wetlands to meet, as a minimum and within reasonable timeframes, the secondary contact recreation objectives in Table 3.2.</p> <p>Objective O18 does not apply to rivers, lakes, groundwater or coastal water within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. Objective O18 only applies to natural wetlands within Whaitua Te Whanganuia-Tara and Te Awarua-o-Porirua Whaitua.</p>	<p>Whaitua sections relating to TAS and CWO.</p>		
<p>Table 3.1 Primary contact recreation and Māori customary use objectives in freshwater bodies.</p>	<p>Retain while further detail on Target Attribute States is developed</p>	<p>Reject</p>	<p>Oppose for the reasons set out in paragraph 8.11 of this evidence.</p>

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
<p>Table 3.2 Secondary contact and Māori customary use recreation objectives in freshwater bodies.</p> <p>Table 3.3 Contact recreation and Māori customary use objectives in coastal water</p>			
<p>3.7 Biodiversity, aquatic ecosystem health and mahinga kai</p> <p>Objective O19</p> <p>Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded such that:</p> <p>(a) water quality, flows, water levels and aquatic and coastal habitats are managed to maintain biodiversity aquatic ecosystem health and mahinga kai, and</p> <p>(b) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a freshwater body or coastal marine area is meaningfully improved so that the objective is met within a reasonable timeframe, and</p> <p>(c) restoration of aquatic ecosystem health and mahinga kai is encouraged.</p>	<p>Wellington Water is seeking the O18 continues to apply to rivers, lakes, groundwater or coastal water within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua while further detail on TASs is developed.</p> <p>This relates to Wellington Water opposing in full the provisions in the Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua sections relating to TAS and CWO.</p>	<p>Reject</p>	<p>Oppose for the reasons set out in paragraph 8.11 of this evidence.</p>

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
<p>3.8 Sites with significant values</p> <p>Objective O25</p> <p>Outstanding water bodies identified in Schedule A (outstanding water bodies) and their significant values are protected and restored. Where the significant values relate to biodiversity, aquatic ecosystem health and mahinga kai, restoration is to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.</p> <p>Note</p> <p>Tables 3.4, 3.5, 3.6, and 3.8 do not apply to Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua, and are therefore not relevant to defining a healthy functioning state within these whaitua.</p> <p>Objective O28</p> <p>Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.</p> <p>Note</p>	<p>Wellington Water opposes the notes which excludes Tables 3.4, 3.5, 3.6, and 3.8 from Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua</p> <p>This relates to Wellington Water opposing in full the provisions in the Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua sections relating to TAS and CWO.</p>	<p>Reject</p>	<p>Oppose for the reasons set out in paragraph 8.11 of this evidence.</p>

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
<p>Tables 3.4, 3.5, 3.6, and 3.8 do not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua, and are therefore not relevant to defining, a healthy functioning state within these whaitua.</p>			
<p>Whaitua Te Whanganui-a-Tara</p>			
<p>Objective WH.O1 The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2400<u>2123</u>.</p>	<p>Wellington water is seeking to amend the timeframe to 2123. Also an issue with the note to the WH.O1</p>	<p>No change to 2100 timeframe. Wai ora state note deleted. Wai ora state appears to be included as part of the objective and includes <u>Water is able to be used for social and economic use benefits, provided that the health and well-being of waterbodies, freshwater ecosystems and coastal waters is not compromised.</u> New note included <u>Note: Objectives WH.O2 to WH.O9 set out what is needed to achieve progressive implementation of this long-term objective up to 2040. Therefore, resource consent applicants do not need to demonstrate their proposed activities align with this objective.</u></p>	<p>Wai ora state note deleted. Wai ora state appears to be included as part of the objective. Support the inclusion of the new wai ora state relating to water being used for social and economic use benefits.</p>

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
<p>Objective WH.O2</p> <p>The health and wellbeing of Te Whanganui-a-Tara’s groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora, such that by 2040-2060:</p> <p>.....</p> <p>(b) 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</p>	<p>Wellington Water is seeking to amend the timeframe to 2060 and amend clause (b). Other minor issues with clauses.</p>	<p>(b) natural form and character is maintained, or where degraded, improvement has been made to the hydrology of rivers, and erosion processes, including bank stability, are improved and sources of sediment are reduced to a more natural level, and the extent and condition of indigenous riparian vegetation is increased and improved, supporting ecosystem health.</p> <p>New clause (i) has been added (i) people and communities can provide for social and economic use benefits, provided that the health and well-being of waterbodies and ecosystems is not compromised.</p>	<p>Change to 2040 timeframe addressed in evidence of client councils</p> <p>Amendments to clause (b) do not include changes sought by Wellington Water, but the inclusion of “maintained, or where degraded, improvement has been made” assists in achieving the outcomes sought by Wellington Water.</p> <p>Support the inclusion of new clause (i)</p>
<p>Objective WH.O3</p> <p>The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or meaningful progress has been made towards improvement improved to achieve the coastal water objectives set out in Table 8.1, and by 2040-2060:</p> <p>.....</p>	<p>Wellington Water opposes the provisions relating to CWO in full and seeks amendments to timeframe and other changes.</p>	<p>The health and wellbeing of Coastal water quality, and the health and wellbeing of ecosystems and habitats in Te Whanganui-a-Tara is maintained, or improved where deteriorated, to achieve the coastal water objectives set out in Table 8.1 and 8.1A, and by 2040:</p>	<p>Change to 2040 timeframe addressed in evidence of client councils</p> <p>Amendments to the objective do not include changes sought by Wellington Water, but the inclusion of “where deteriorated” assists in achieving the outcomes sought by Wellington Water.</p>

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
		<p>Clause (b) has been deleted because it “resolves a conflicting expectation for metals between this clause and the ‘maintenance’ approach within the table”</p> <p>A new clause for coastal areas not covered by the table has been added.</p>	
<p>Table 8.1 Coastal Water Objectives</p>	<p>Wellington Water opposes the provisions relating to CWO in full. Concerns that Table 8.1 lacks the required information to set baseline states for the Coastal Water Management Units to assess whether the state is being maintained or improved.</p>	<p>Additional content is included in Table 8.1. Intended to improve plan clarity through inclusion of additional baseline data content. New Table 8.1A: Coastal water enterococci objectives has been included.</p>	<p>Changes to the tables will be addressed by Wellington Water in Hearing Stream 4.</p>
<p>Objective WH.08 Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact by ensuring that by <u>2040-2060</u>: </p>			<p>Change to 2040 timeframe addressed in evidence of client councils</p>
<p>Objective WH.09 Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved by ensuring that:</p>	<p>Wellington Water opposes the provisions relating to TAS in full. Wellington Water is seeking an amendment to WH.09(a)</p>	<p>WWL requested change to clause (a) not included. New clauses (d) and (e) added.</p>	<p>Amendments to clause (a) do not include changes sought by Wellington Water.</p>

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
<p>(a) where a target attribute state in Table 8.4 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 <u>or meaningful progress has been made</u>, and</p> <p>(b) where a target attribute state in Table 8.4 is met, the state of that attribute is at least maintained in all rivers within the part Freshwater Management Unit, and</p> <p>(c) where any attribute in any river or river reach is in a better state than the target attribute state, that attribute is at least maintained at the better state in every river or river reach, and</p> <p>(d) where a huanga of mahinga kai and Māori customary use for locations identified in Schedule B (Ngā Taonga Nui a Kiwa) and is not achieved, the state of the river or river reach is improved.</p>	<p>The lack of information relating to baseline states and timeframes to meet the requirements makes it difficult to determine whether improvement is measurable. It is also not clear how the TAS provisions would be assessed and measured through the resource consent process.</p>	<p><u>(d) where improvements are required to existing wastewater or stormwater networks:</u></p> <p><u>(i) prioritise E. coli/enterococci reductions that contribute to achieving the targets for primary contact site locations in Table 8.3, ahead of coastal targets in Table 8.1A and then the broader part Freshwater Management Unit E. coli targets in Table 8.4.</u></p> <p><u>(ii) prioritise dissolved copper and dissolved zinc reductions in locations where macroinvertebrate target attribute state(s) in Table 8.4 are not met once the priorities in clause (i) above have been addressed.</u></p> <p><u>(e) the targets in Table 8.4 are managed and monitored at a part Freshwater Management Unit level, by the Council on behalf of mana whenua and the wider community, and, where specific policies and rules are included in this chapter of the plan to manage an activity, and:</u></p> <p><u>(i) when the specific policies and rules are fully satisfied, then the target attribute states can be</u></p>	<p>If the timeframe is not changed Objective WH.O9 clause (a) should be amended as follows.</p> <p>(a) where a target attribute state in Table 8.4 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 <u>or ongoing progress towards meeting the target has been demonstrated.</u></p> <p>Support the inclusion of clause (d) but for the reasons set out in paragraphs 8.16 to 8.23 of this evidence the clause should be a plan method and drafted as guidance.</p>

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
		<p><u>considered to be consistent with this objective; or</u></p> <p><u>(ii) when the specific policies and rules are not satisfied, then an assessment of the impact of an activity or discharge on the achievement of the target attribute states will be required; or</u></p> <p><u>(iii) where policies and rules are not included in this chapter to manage the proposed activity, then an assessment of the impact of an activity or discharge on the achievement of the target attribute states will be required.</u></p> <p>The insertion of Clause (e) is intended to clarify the nature of the objective and who is responsible for meeting the targets.</p>	
<p>New Objective included in chapter 8</p>		<p><u>Objective WH.10</u></p> <p><u>By 2030, there is no further decline of the health and wellbeing of Te Whanganui-a-Tara's lakes and rivers.</u></p> <p>This new objective is intended to establish a 'no further decline' imperative by 2030 in line with</p>	<p>Oppose for the reasons set out in paragraphs 8.24 to 8.29 of this evidence.</p>

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
		the 10 year interim targets required by the NPS-FM.	
Table 8.4 Target attribute states for rivers	Wellington Water opposes the provisions relating to TAS in full. Wellington Water seeks that this table is withdrawn The submission raises specific concerns with table 8.4 relating to Periphyton Biomass, E.coli, fish / fish community health, Macroinvertebrates, suspended fine sediment, dissolved oxygen, dissolved organic nitrogen, dissolved copper and zinc, ecosystem metabolism, ammonia and nitrate toxicity.	Changes to Table 8.4 are meant to respond to scientific recommendations to refine the key attributes for ecosystem health. They also improve the achievability of targets, with consideration for the costs and practicability of achieving the required improvements within the specified timeframe.	Changes to the tables will be addressed by Wellington Water in Hearing Stream 4.
Te Awarua-o-Porirua Whaitua			
Objective P.O1 The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100. Note In the wai ora state:	Wellington water is seeking to amend the timeframe to 2123. Also an issue with the note	Same amendments as WH.01	Refer to response for WH.O1

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
<p>Objective P.O2 Te Awarua-o-Porirua’s groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora, such that by 2040:</p>	<p>WWL seeking to amend the timeframe to 2060</p>	<p>Same amendments as WH.02</p>	<p>Refer to response for WH.O2</p>
<p>Objective P.O3 The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o- Porirua is maintained or improved <u>meaningful progress has been made towards improvement</u> to achieve the coastal water objectives set out in Table 9.1, and by 2040 <u>2060</u>:</p>	<p>Wellington Water opposes the provisions relating to CWO in full and is seeking an amendment to P.O3.</p>	<p>Same amendments as WH.03</p>	<p>Refer to response for WH.O3</p>
<p>New Objective included in chapter 8</p>		<p><u>Objective P.O7</u> <u>By 2030, there is no further decline of the health and wellbeing of Te Awarua-o-Porirua’s rivers.</u></p>	<p>Refer to response for WH.O10</p>
<p>Table 9.1 Coastal Water Objectives</p>	<p>Wellington Water opposes the provisions relating to CWO and is concerned that Table 9.1 lacks the required information to set baseline states for Coastal Water</p>	<p>Additional content is included in Table 9.1. Intended to improve plan clarity through inclusion of additional baseline data content. New Table 9.1A: Coastal water</p>	<p>Changes to the tables will be addressed by Wellington Water in Hearing Stream 4.</p>

Objective	Relief Sought / Commentary	s42A Recommended Changes	Response to s42A
	<p>Management Units to assess whether the state is being maintained or improved.</p> <p>Wellington Water questions how the CWO would be assessed and measured in a resource consent process</p>	<p>enterococci objectives has been included.</p>	
<p>Objective P.06</p>	<p>Same objective as Objective WH.09</p> <p>Same commentary for WH.09</p>	<p>Same amendments as WH.09</p>	<p>Refer to response for WH.09</p>
<p>Table 9.2: Target attribute states for rivers</p>	<p>Wellington Water opposes the provisions relating to TAS in full.</p> <p>Wellington Water seeks that this table is withdrawn until further information on baseline states and implications of TAS for sub-catchments.</p>		<p>Changes to the tables will be addressed by Wellington Water in Hearing Stream 4.</p>

Appendix B Amendments to ecosystem health and water quality policies sought by Wellington Water, GWRC response and Wellington Water position

Wellington Water amendments shown as ~~strikethrough~~ for deletion and underlining for additional text.

GWRC amendments shown as ~~strikethrough~~ for deletion and underlining for additional text.

Policy	Relief Sought / Commentary	S42A Recommended Changes	Response to s42A
<p>Policy WH.P1: Improvement of aquatic ecosystem health</p> <p>Aquatic ecosystem health will be improved by:</p> <p>(a) progressively reducing the load or concentration of contaminants, particularly sediment, nutrients, pathogens and metals, entering water, and</p> <p>(b) restoring habitats, and</p> <p>(c) enhancing <u>maintaining or improving</u> the natural flow regime of rivers and managing water flows and levels, including where there is interaction of flows between surface water and groundwater, and</p> <p>(d) co-ordinating and prioritising work programmes in catchments that require changes to land use activities that impact on water.</p>	<p>Supports clause (a) progressively reducing the load.</p> <p>Clause (c): replace 'enhancing' with 'maintaining or improving'.</p> <p>Define or use more specific word for "work programmes"</p>	<p>Policy WH.P1: Improvement of aquatic ecosystem health</p> <p>Aquatic ecosystem health will be improved, <u>where deteriorated</u>, by:</p> <p>(a) progressively reducing the load or concentration of contaminants, particularly sediment, nutrients, pathogens and metals, entering water, and</p> <p>(b) restoring habitats, and</p> <p>(c) enhancing the natural flow regime of rivers and managing water flows and levels, including where there is interaction of flows between surface water and groundwater, and</p> <p>(d) co-ordinating and prioritising work programmes promoting non-regulatory methods that seek to improve aquatic ecosystem health, in accordance with M36-M45 of the plan in catchments that require changes to land use activities that impact on water.</p>	<p>Support the inclusion of 'where deteriorated'. This addresses the amendments sought by Wellington Water to clause (c).</p> <p>Support the changes to clause (d).</p>

Policy	Relief Sought / Commentary	S42A Recommended Changes	Response to s42A
<p>Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives</p> <p>Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</p> <p>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</p> <p>(b) encouraging <u>and where appropriate requiring</u> redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</p> <p>(c) imposing hydrological controls on:</p> <p>(i) urban development and</p> <p>(ii) <u>where appropriate and practicable</u> stormwater discharges to rivers <u>in relation to stream bank erosion</u></p>	<p>Wellington Water requests clarification regarding how the Freshwater Action Plan provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32.</p> <p>Seeking clarity over relationship between 'nonregulatory methods' and 'work programmes'.</p>	<p>Policy deleted based on:</p> <ul style="list-style-type: none"> - the recommended amendments remove unnecessary duplication with the requirements of more specific provisions (policies, rules and schedules) of PC1 and the NRP and support implementation by deferring guidance on the management of activities to the relevant activity specific provisions. - In relation to riparian planting, recommended amendments (to this policy and WH.P27 below) address a gap in PC1 as notified related to the use of riparian planting to support improvements to aquatic ecosystem health by reducing effects of nutrients in diffuse charges and sediment through stabilising stream banks. 	<p>Neutral</p>

Policy	Relief Sought / Commentary	S42A Recommended Changes	Response to s42A
<p>(d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</p> <p>(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</p> <p>(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</p> <p>(g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</p> <p>(h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</p>			
<p>Policy WH.P4: Achievement of the visual clarity target attribute states</p> <p>To achieve the visual clarity target attribute states in Table 8.4 in part Freshwater Management Units where the target attribute state is:</p>	<p>A detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis to determine appropriateness of the requirements and 2040 timeframes, and implications for sub-catchment prioritisation.</p>	<p>Policy WH.P4: Achievement of the visual clarity target attribute states</p> <p>To achieve the visual clarity target attribute states in Table 8.4 in part Freshwater Management Units where the target attribute state is:</p> <p>(a) met, the mean annual sediment load must be at least maintained, and</p>	<p>Refer to paragraphs 9.4 to 9.5 of this evidence.</p>

Policy	Relief Sought / Commentary	S42A Recommended Changes	Response to s42A
<p>(a) met, the mean annual sediment load must be at least maintained, and</p> <p>(b) where it is not met, the mean annual sediment load must be reduced as set out in Table 8.5.</p>	<p>There is uncertainty regarding the modelled correlation between sediment loads and visual clarity and further assessment is needed.</p> <p>TAS for visual clarity and deposited sediment need to be set taking into consideration all contributing sediment sources, and the following points also need to be addressed:</p> <ol style="list-style-type: none"> 1. How sediment load reductions will be measured in the future 2. How would proportionate contribution to sediment be measured and any reduction in this contribution be measured 	<p>(b) where it is not met, <u>a percentage reduction in the mean annual sediment load</u> must be <u>achieved</u> reduced as set out in Table 8.5.</p>	
<p>Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states</p>	<p>Refer relief sought for WH.P4</p>		<p>Changes to the tables will be addressed by Wellington Water in Hearing Stream 4.</p>
<p>Policy P.P1: Improvement of aquatic ecosystem health</p> <p>Aquatic ecosystem health will be improved by:</p> <p>(a) progressively reducing the load or concentration of contaminants, particularly sediment, nutrients,</p>	<p>Supports clause (a) progressively reducing the load.</p> <p>Clause (c): replace 'enhancing' with 'maintaining or improving'.</p> <p>Define or use more specific word for "work programmes</p>	<p>Same amendments as WH.P1</p>	<p>Refer to response for WH.P1</p>

Policy	Relief Sought / Commentary	S42A Recommended Changes	Response to s42A
<p>pathogens and metals, entering water, and</p> <p>(b) restoring habitats, and</p> <p>(c) enhancing <u>maintaining or improving</u> the natural flow regime of rivers and managing water flows and levels, including where there is interaction of flows between surface water and groundwater, and</p> <p>(d) co-ordinating and prioritising work programmes in catchments that require changes to land use activities that impact on water.</p>			
<p>Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives</p> <p>Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</p> <p>(a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</p>	<p>Wellington Water requests clarification regarding how the Freshwater Action Plan provisions will work alongside existing TAS provisions, network discharge consent provisions, and in particular Schedules 31 and 32.</p> <p>Seeking clarity over relationship between 'nonregulatory methods' and 'work programmes'.</p>	<p>Recommended deletion of this policy</p>	<p>Refer to response for WH.P2</p>

Policy	Relief Sought / Commentary	S42A Recommended Changes	Response to s42A
<p>(b) encouraging and where appropriate requiring redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</p> <p>(c) imposing hydrological controls on:</p> <p>(i) urban development and</p> <p>(ii) where appropriate and practicable stormwater discharges to rivers <u>in relation to stream bank erosion</u></p> <p>(d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</p> <p>(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</p> <p>(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</p> <p>(g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</p>			

Policy	Relief Sought / Commentary	S42A Recommended Changes	Response to s42A
(h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.			
<p>Policy P.P4: Achievement of the visual clarity target attribute states</p> <p>To achieve the visual clarity target attribute states in Table 8.4 in part Freshwater Management Units where the target attribute state is:</p> <p>(a) met, the mean annual sediment load must be at least maintained, and</p> <p>(b) where it is not met, the mean annual sediment load must be reduced as set out in Table 8.5.</p>	<p>A detailed assessment of the implications of the TAS provisions is required on a sub-catchment basis to determine appropriateness of the requirements and 2040 timeframes, and implications for sub-catchment prioritisation.</p> <p>There is uncertainty regarding the modelled correlation between sediment loads and visual clarity and further assessment is needed.</p> <p>TAS for visual clarity and deposited sediment need to be set taking into consideration all contributing sediment sources, and the following points also need to be addressed:</p> <ol style="list-style-type: none"> 1. How sediment load reductions will be measured in the future 2. How would proportionate contribution to sediment be measured and any reduction in this contribution be measured 	Same amendments as WH.P4	Refer to response for WH.P4

Policy	Relief Sought / Commentary	S42A Recommended Changes	Response to s42A
Table 9.5: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state	Refer relief sought for WH.P4		Refer to response for WH.P4

