

Notice of Wellington Water Limited's wish to be party to proceedings

To the Registrar
Environment Court
Wellington

1. Wellington Water Limited (**WWL**) wishes to be a party to the following appeal of decisions on the Proposed Natural Resources Plan (**the Plan**) for the Wellington Region:

Federated Farmers of New Zealand Inc v Wellington Regional Council, ENV-2019-WLG-000126

2. WWL is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
3. WWL agrees to participate in mediation or other alternative dispute resolution of the proceedings.
4. WWL is interested in the part of the proceedings related to:

Definition of "category 2 surface water body"

5. WWL opposes the relief sought on this part, as it is unclear how this would integrate with other related definitions and provisions which are the subject of WWL's appeal (ENV-2019-WLG-123).
6. WWL is interested in the part of the proceedings related to:

Definition of "drain"

7. WWL opposes the relief sought on this part, as the relief sought is unclear, and WWL is therefore unable to discern what effect the relief may have on water quality outcomes that WWL supports.
8. WWL is interested in the part of the proceedings related to:

Definition of "highly modified river or stream"

9. WWL opposes the relief sought on this part, as it is inappropriate to include new mapping that has not undergone a full Schedule 1 process.
10. WWL is interested in the part of the proceedings related to:

Definition of "surface water bodies"

11. WWL opposes the relief sought on this part, as it is unclear how this would integrate with other related definitions and provisions which are the subject of WWL's appeal (ENV-2019-WLG-123).

12. WWL is interested in the part of the proceedings related to:

Rules R37: Agrichemicals into water – permitted activity and R36B: Motorised and aerial discharge of agrichemicals – permitted activity

13. WWL opposes the relief sought on this part, to the extent that it may impact on drinking water supplies and downstream monitoring results for stormwater discharge consents held by local authorities.

14. WWL is interested in the part of the proceedings related to:

Rules R67: All other discharges to sites of significance – non-complying activity and R68: All other discharges – discretionary activity

15. WWL opposes the relief sought on this part, because there is insufficient detail in the relief sought to provide reasonable certainty that drinking water supplies will be protected, and controlled activity status is not appropriate to manage the potential effects of the activity.

16. WWL is interested in the part of the proceedings related to:

Rule R82: Discharge of fertiliser from ground-based or aerial discharge – permitted activity

17. WWL opposes the relief sought on this part, because of the potential for eutrophication in the waterways and impact on drinking water supplies and on downstream monitoring results for stormwater discharge consents held by local authorities.

18. WWL is interested in the part of the proceedings related to:

Rule R98A: Livestock access to any Category 1 surface water body – non complying

19. WWL opposes this part of the proceedings because there is insufficient detail in the relief sought to provide reasonable certainty that drinking water supplies will be protected.

20. WWL is interested in the part of the proceedings related to:

Rule R99: Earthworks

21. WWL opposes the relief sought on this part. The deletion or amendments sought in respect of clauses (c) and (e) may have adverse effects on

drinking water supplies and undermine the water quality objectives of the Plan that WWL supports.

22. WWL is interested in the part of the proceedings related to:

Rule R100: Vegetation clearance on erosion prone land – permitted activity

23. WWL opposes the relief sought on this part, as it may have adverse effects on drinking water supplies and undermine the water quality objectives of the Plan, which WWL supports.

24. WWL is interested in the part of the proceedings related to:

Rule R101: Earthworks and vegetation clearance – discretionary activity

25. WWL opposes the relief sought on this part, because there is insufficient detail in the relief sought to provide reasonable certainty that drinking water supplies will be protected. Further, controlled activity status is not appropriate for use of land and associated discharges of sediment into water or onto/into land where it may enter water from earthworks not permitted by Rule R99 Earthworks – permitted activity or for vegetation clearance on erosion prone land.

26. WWL made submissions on the definitions of “drain” and “highly modified river or stream”, and has an interest in the proceedings that is greater than the interest that the general public has, because the proceedings relate to provisions that affect existing and future drinking water supplies, and stormwater infrastructure, for which WWL is responsible.



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