

## 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:

**Porirua City Council v Wellington Regional Council, ENV-2019-WLG-000116**

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 "contaminant"**

5. WWL conditionally opposes the relief sought in relation to this part. It is not clear what benefit a new definition, different from the definition in the Resource Management Act, would provide. To the extent that the benefit remains unclear, WWL opposes the introduction of a new definition.
6. WWL is interested in the part of the proceedings related to:

**Definition of "good management practice"**

7. WWL supports the relief sought in relation to this part for the reasons stated in Porirua City Council's (**PCC**'s) appeal, WWL's submissions and WWL's appeal (ENV-2019-WLG-123).

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

**Definition of "regionally significant infrastructure"**

9. WWL supports the relief sought in relation to this part. Landfills are a necessary aspect of the wastewater treatment process and hence it is appropriate for landfills to be defined as regionally significant infrastructure.

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

**Definition of “vegetation clearance”**

11. WWL conditionally supports the relief sought in relation to this part. WWL supports the intention to provide greater clarity, and to enable a wider range of permitted activities under the related Rule R100, but the relief sought may not achieve the desired outcomes. To that extent WWL supports additional and/or consequential relief as may be necessary to give effect to the the intention.

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

**Objective O13**

13. WWL supports the relief sought in relation to this part, for the reasons stated in WWL's submissions and appeal (ENV-2019-WLG-123). The objective should be amended so that the regionally significant infrastructure that WWL manages is protected against reverse sensitivity in all environments to give effect to Policy 8 of the Wellington Regional Policy Statement.

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

**New policy – climate change**

15. WWL supports the relief sought in relation to this part for the reasons stated in PCC's appeal.

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

**New policy – urban areas**

17. WWL supports the relief sought in relation to this part for the reasons stated in PCC's appeal, and to better align the Plan with the National Policy Statement on Urban Development Capacity.

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

**Policy P39 Adverse effects on outstanding water bodies**

19. WWL supports the relief sought in relation to this part. WWL has raised similar issues in its submissions and its appeal (ENV-2019-WLG-123), specifically in relation to the three waters infrastructure that WWL manages. WWL supports the reasons for appeal and relief sought by PCC as an additional matter to those raised by WWL in its appeal. WWL is concerned that Policy P39 may unduly restrict necessary activities in Schedule A locations, in particular installation and maintenance of critical infrastructure for water supply.

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

**Policy P48 Protection of natural features and landscapes**

21. WWL supports the relief sought in relation to this part, as it will assist to make the Plan more practicable for the regionally significant infrastructure that WWL manages.

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

**Policy P90 Discharges of hazardous substances**

23. WWL opposes the relief sought in relation to this part to the extent that it will create an unreasonable burden on the holders of stormwater discharge consents to manage downstream effects.

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

**Rule R100 Vegetation clearance on erosion prone land**

25. WWL supports the relief sought in relation to this part for the reasons stated in PCC's appeal. The relief sought will assist WWL's management of vegetation associated with three waters infrastructure.

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

**Beds of Lakes and Rivers – general conditions 5.5.4**

27. WWL supports the relief sought in relation to paragraph (f) of the general conditions. The relief sought will assist to make the Plan more practicable for the regionally significant infrastructure that WWL manages.

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

**Rule R115 Culverts**

29. WWL supports the relief sought in relation to this part for the reasons stated in PCC's appeal.

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

**New rule (after Rule R116)**

31. WWL supports the relief sought for the reasons stated in WWL's submissions and appeal (ENV-2019-WLG-123) in relation to Rules R112, R114, R115 and R116, and for the reasons stated in PCC's appeal. It is appropriate that the Plan provides for existing lawful structures in, on and under the beds of lakes and rivers as a permitted activity.

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

**New Rules R127A and R127B and amendments to Rules R127  
Reclamation of the beds of rivers or lakes and R128 Reclamation of  
the bed of an outstanding river, lake or Schedule C site, and  
associated diversion**

33. WWL opposes the relief sought in relation to this part. The relief sought does not allow consideration of flood hazards that may result from reclamation, which fails to give effect to the relief WWL has sought in relation to Policy P102 (in its appeal ENV-2019-WLG-123).

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

**Rule R161 New structures, additions or alterations to structures outside  
sites of significance**

35. WWL supports the relief sought in relation to this part, as it will assist to make the Plan more practicable for the regionally significant infrastructure that WWL manages.

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

**Rule R162 New structures, additions or alterations to structures inside  
sites of significance**

37. WWL supports the relief sought in relation to this part, as it will assist to make the Plan more practicable for the regionally significant infrastructure that WWL manages.

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

**New rule - seawalls**

39. WWL supports the relief sought in relation to this part, for the reasons stated in PCC's appeal. Further, the relief sought will better align with Policy P139 and provide for seawalls that may be necessary to protect parts of the regionally significant infrastructure that WWL manages.

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

**New method – enabling urban development**

41. WWL supports the relief sought in relation to this part, for the reasons stated in PCC's appeal.

42. WWL made submissions on the definitions of "good management practice", "regionally significant infrastructure" and "vegetation clearance"; Objective O13; Policy P39; Beds of Lakes and Rivers general conditions, section 5.5.4;

Rules R112, R114, R116, R127; and has an interest in the parts of the proceedings identified in this notice that is greater than the interest that the general public has because those parts relate to provisions that affect water infrastructure and services, for which WWL is responsible.



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