

Submission on Wellington Regional Council's Proposed Plan Change 1 to the Natural Resources Plan

15 December 2023

To: Greater Wellington Regional Council

By email: regionalplan@gw.govt.nz

From: Royal Forest and Bird Protection Society NZ (Forest & Bird)

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cc: freshwater@forestandbird.org.nz

- Forest & Bird could not gain an advantage in trade competition through this submission.
- Forest & Bird wishes to be heard in support of this submission, and would be prepared to
 consider presenting this submission in a joint case with others making a similar submission at
 any hearing.

INTRODUCTION

 Forest & Bird is New Zealand's largest non-governmental conservation organisation with many members and supporters. Volunteers in 50 branches carry out community conservation projects around New Zealand. Forest & Bird's constitutional purpose is:

To take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand.

2. In support of that purpose, Forest & Bird regularly participates in resource management processes at the national, regional, and district level.

- 3. This is a submission on Proposed Plan Change 1 to the Natural Resources Plan, on behalf of Forest & Bird's branches and Forest & Bird nationally. It begins with general overall submission points (in this document) followed by specific submissions on each provision of interest to Forest & Bird (in the attached excel spreadsheet provided by the council).
- 4. The attached excel spreadsheet sets out Forest & Bird's more detailed submission points. The decisions sought are necessary to ensure the plan change:
 - a. Achieve the purpose and principles of the RMA;
 - b. Give effect to the National Policy Statement for Freshwater Management 2020;
 - c. Give effects to the provisions of the New Zealand Coastal Policy Statement 2010;
 - d. Give effect to the National Policy Statement for Indigenous Biodiversity; and
 - e. Give effect to the Regional Policy Statement.
- 5. Forest & bird also seeks further consequential or alternative relief as may be necessary and appropriate to address concerns identified in its submission.

GENERAL POINTS

Definitions

6. The definitions in PC1 are important in how the rules work. In some cases these definitions are limits or define key terms inappropriately, and amendments are required. See the attached excel spreadsheet. Further, many definitions simply cross-reference definitions found in legislation including regulations. The text should be set out for ease of use by plan readers.

Water quality target attribute state tables – DIN, DRP, periphyton, habitat, etc.

7. While Forest & Bird is generally supportive of the Target Attribute State tables, the targets are too high in some part FMUs (e.g., DIN above 1 mg/L in some part FMUs). These need to be lower. In the Taupō part FMU the numeric target (e.g., for median Ammonia toxicity) appears to be above the modelled baseline. This is not permissible as targets must be at or below (better than) the baseline. More comments on the water quality targets are provided in the spreadsheet.

8. Target Attribute States should be introduced for 'habitat' and 'natural form and character' which river management / flood protection activities etc. must seek to achieve. These should be included as targets for Habitat Quality Index / Natural Character Index scores, and/or physical properties to achieve for the river - e.g., target states for average channel width, sinuosity, riffle/run/pool sequences, area of gravel, etc. This would be consistent with Policy 30 in the plan, including (c) "maintain or where practicable restore aquatic habitat diversity and quality, including: the form, frequency and pattern of pools, runs, and riffles in rivers, and the natural form of river". Activities should then be required to undertake activities in a way that illustrates they are maintaining habitat quality in accordance with the target attributes states (whether they be to maintain or improve).

Timeframes for target attribute states and objectives

9. The target attribute state tables include timeframes, which are generally 2040. Under the NPSFM, target states are required to be set at intervals of no longer than 10 years (NPSFM s3.11). This means interim target states need to be set out in the plan (or a shorter timeframe is required – 2033 at the latest). The targets must also reflect the state that achieves the long term visions are must reflect these (which are currently part of the RPS plan change 1, so it is difficult to comment on these in detail prior to decisions).

Values

10. It is not clear what the identified values are for each of the FMUs. These should be identified and each value should have at least one environmental outcome. It appears the environmental outcome objectives are combined (which we are not opposed to) but it is not clear which outcome relates to which value. This needs to be made clear.

Flows

11. We understand that there is limited change to the flow provisions in the NRP through this plan change. However, we are concerned the flows provisions do not comply with the NPSFM. Environmental flows and levels need to be rules in the plan, as do take limits. In the proposed plan it appears flows, levels, and take limits are a mixture of policies, rules, and definitions. These should be clearly stated as rules – giving council the power to review existing consents to

bring them in line with new flows and limits. The rules also allow taking water below minimum flows, which provides for overallocation and is contrary to the NPSFM. Takes below minimum flows and in exceedance of allocation limits should be prohibited.

- 12. While the plan change does amend flows/allocation for the Porirua whaitua, the s32 states that flows/allocation will be added for Te Whanganui a Tara 'in a later plan change'. It is not clear when that will occur. Forest & Bird is concerned about the effectiveness of this approach. Interim limits need to be set to ensure life supporting capacity requirements for indigenous species are safeguarded.
- 13. The flows/allocation approach for the Porirua whaitua also allows takes for drinking water below minimum flows, so does not comply with the NPSFM directive to avoid over allocation. We are also concerned the take limits/allocation limits may not achieve the environmental outcomes.

Te Mana o te Wai

- 14. We support the concept of Te Mana o te Wai and want to see it effected throughout the plan. This will protect ecosystem health, as well as community health and the health of people that is critical to society.
- 15. Plan provisions should together achieve TMOTW. This should be set out at a high level in the RPS and then effected through the plan. As noted regarding long term visions above, how TMOTW is implemented is subject to PC1 to the RPS. Again, it is difficult to comment on this without decisions on PC1 to the RPS, but we note here that this will need to be considered as part of PC1 to the NRP.

Action Plans

16. With regard to Schedule 27L Freshwater AAction Plan requirements: A2 and A3 need to address all the Appendix 2B attributes for all the part FMUs (as required by NPSFM 3.12(2)(b)). As noted in the attached spreadsheet, we consider it important that this include natural form and character and habitat (as a part of ecosystem health). If the target attribute states are already achieved, the action plan should set out how they will be maintained. This should be reflected

in B1(6) and B2 which need amending to reflect actions to maintain (not to provide for "no further action" as currently proposed). The Schedule should also specify that action plans will set out how the target attribute states will be achieved within the timeframe set in the relevant tables, and this should be reflected in A1 and B2(1)(b). B3(1) is for attributes including nitrogen – but is critically missing DIN (i.e., it should include nitrogen for ecosystem health, <u>not</u> just for toxicity). The actions in B3(1) focus on sediment, but should be broader and needs actions added that relate to nitrate and DIN. The action plans also need to integrate with action plans required under 3.25 to return rivers to natural hard bottom states.

Nitrogen risk assessment tool

- 17. The current provision for a 'recognised nitrogen risk assessment tool' allows a tool to be used to fulfil the policies in the plan by a process outside Schedule 1. Essentially, council could approve any tool so long as its 'quantitative' and assesses risk of nitrogen discharge. There are no other criteria or processes provided for approval, which raises questions around unlawful delegation and whether it is lawful to essentially amend the plan in that way.
- 18. Biophysical factors (i.e. soil and rainfall) are a critical factor in the risk and the actual impact on the environment. It is critical that any tool accounts for biophysical factors and relates to the actual discharge or environmental effects of that discharge. Any "recognised nitrogen risk assessment tool" must be subject to wider public scrutiny before being included in the plan.

Financial contributions

- 19. The plan policies relate financial contributions to being for the purpose of 'offsetting'. However, financial contributions are more akin to environmental compensation than offsetting.
- 20. Forest & Bird appreciates the way these appear to be envisioned is being used to improve stormwater treatment elsewhere in the catchment to 'offset' increased stormwater discharges elsewhere. This is very similar to offsetting, but is being proposed to be done by the council at an aggregated level, instead of by the consent holder at the project level.
- 21. The NPSFM requires avoidance, then minimisation, then offsetting before considering compensation. The policies in Plan Change 1 only require minimisation then jump straight to

compensation. This is inconsistent with the NPSFM. Schedule 30 suggests that s108 only allows financial contribution for the purpose of offsetting, however financial contributions can be for any purpose specified in the plan. Any reference to offset and compensation in the plan must be consistent with the offset and compensation framework in the NPSFM, good practice guidance on offsetting. In the coastal environment, the NZCPS will prevail use of offsetting and compensation may be contrary to NZCPS directives.

Farm Plans

- 22. Proposed Plan Change 1 essentially sets up farming as a permitted activity provided there is a farm plan for the activity.
- 23. The requirements for farm plans are spread across PC1 Schedule 36 and the existing NRP, which could be confusing for plan users, and consideration should be given to whether this can be improved.
- 24. We note the plan does not have to permit farms that have farm plans it can impose additional regulation. Given the significant challenge with contaminants in the Porirua whaitua in particular (e.g., sediment), it is critical that council regulates land use (including on smaller parcels of land) to manage cumulative effects. Council should also have the ability to decline resource consent for farming activity where it is not confident the effects will be appropriately managed by a farm plan. For this reason, council should have scope to decline consent in these whaitua and a stronger activity status than permitted is required. Permitted status is only appropriate if there is no need for the council to have oversight of the content of farm plans and they can be written by farm advisers in a way that there is certainty the adverse effects of farms will result in the desired environmental outcome. We are concerned this will not be possible in the Porirua Whaitua in particular.
- 25. In lieu of strengthening the activity status for farming, the requirements should be amended/strengthened and written in a way that is clear and does not require interpretation. For example, in Schedule 36:

- a. Management objective B should define 'revegetation' so that it means 'woody vegetation' or 'indigenous woody vegetation'. Otherwise it could be interpreted to mean grass, or weeds, etc.
- b. Management objective B should define 'not reasonably practicable' by setting out the circumstances or considerations that would make revegetation 'not reasonably practicable' or else it is up to a case-by-case assessment and could include considerations of cost or other goals of the farmer. If the 'not reasonably practicable' exemption is used, the certifier should assess the soil erosion control measures using an accepted methodology (not just estimating it).
- c. Management objective B should include not increasing nitrogen loss risk above the baselines in C(1) in order to maintain water quality and achieve policies of plan.
- d. E erosion risk plan needs to have clear enforceable goals, and the provisions for critical source areas need to apply across the farm not just on high erosion risk land.
- e. F small steam riparian programme needs to have clear enforceable goals; clear criteria for how to assess risk of erosion, deposition and damage to the stream bed (a stocking rate threshold may be a good alternative); and clear criteria for when fencing is required, when it is not practicable, and how alternative measures to fencing to minimise stock access to water will be assessed. As proposed, we are concerned they do not implement WH.P26.

Ephemeral water courses

26. Farm plan 'critical source area' management and small stream stock exclusion provisions need to be strengthened as above to protect ephemeral water courses.

SEE ATTACHED EXCEL SHEET FOR FURTHER COMMENTS ON PROVISIONS

Once you have completed your feedback, please email to regionalplan@gw.govt.nz

	Please enter your details below	
*Submitter Name: Full name, or Name of Organisation / Company	Forest & Bird	
Contact person for submission: (If different to above)	Amelia Geary	
Telephone no: (Not required)	Insert	
*Address for service: (Email, or physical address) Please note, an email address is the preferred method	r@forestandbird.org.nz; a.geary@forestandbi	ird.org
*I wish to be heard in support of my submission at a hearing	Yes	
*I would consider presenting a joint case at the hearing with others who make a similar submission	Yes	
*I could gain an advantage in trade competition through this submission	No	
Only answer this question if you answered 'yes' to the above question. I am directly affected by an effect of the subject matter of the submission that: A) adversely affects the environment; and B) does not relate to trade competition or the effects of trade competition	Select A or B	
	Wellington, I agree to having read and utlined in our Information Statement	
If providing a submission on behalf of a company / organisation I confirm that I have authority to do so:	Signature	
Date:	15/12/2023	
	sheet "2) Feedback on Provisions". All of the in included so please place your comments in t	he

If you have questions on how to use this submission form please use our **Submitter User Help Guide** or email one of our friendly team at regionalplan@gw.govt.nz

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	Decision Sought *
		Amended	Support	Freshwater	Please provide a	Please describe the actual changes to the provision that you would like to see
		New	Oppose	Part 1 Schedule 1	summary of the	and, where possible, include your suggested alternative wording.
		Not applicable to	Neutral	Both	reasons for your	
		Whaitua	Amend		feedback on each	NOTE: Any deletions should be identified using strikethrough, and insertions
		Not applicable to	Not stated		provision to help us	should be identified using bold .
		Te-Awarua-o-			understand your	
		Porirua			position.	
		N/A			,	
2 Interpretation	2.2 Definitions	Amended		Both		
	Afforestation	New	Oppose	Freshwater	Reference to full	Include full text of definition.
					text better assists plan users.	
	Allocation amount	Amended	Select stance	Part 1 Schedule 1	piuri users.	
	Annual stocking rate	New	Support	Freshwater	Helps give effect to	Retain.
	, and a coordinate				NPSFM provisions	
	Catchment management unit	Amended	Select stance	Part 1 Schedule 1		
	Coastal water management units	New	Select stance	Part 1 Schedule 1		
	Containment standard	New	Select stance	Part 1 Schedule 1		
	Core allocation	Amended	Select stance	Part 1 Schedule 1		
	Dry weather discharges	New	Select stance	Part 1 Schedule 1		
	Earthworks	New	Select stance	Part 1 Schedule 1	Reference to full	Include full text of definition of earthworks (from the NES).
					text better assists	
					plan users.	
	Effective hectares	New	Select stance	Freshwater	prem decres	
	Environmental outcomes	New	Amend	Part 1 Schedule 1	Additional	Include reference to objectives WH.O6, WH.O7 and WH.O8 and P.O5 and P.O6
			, and		objectives are	(not there may be others we have missed).
					required to meet	(Not there may be others we have missea).
					NPSFM	
					requirements. This	
					definition should	
					include objectives	
					WH.06, WH.07	
					and WH.O8 and	
					P.O5 and P.O6.	
					These are the	
					outcomes that	
					relate to	
					groundwater levels	
					and integrity and	
					the compulsory	
					value of contact	
					recreation. This	
					may not be a	
					comprehensive list.	
	Erosion and sediment management plan	New	Select stance	Freshwater		
	Erosion risk treatment plan	New	Select stance	Freshwater		
	Existing wastewater discharge	New	Select stance	Part 1 Schedule 1		
	Harbour arm catchments	New	Select stance	Part 1 Schedule 1	1	

Harvesting	New	Amend	Freshwater	Reference to full text better assists plan users.	Include full text of definition.
High risk industrial or trade premise	New	Select stance	Part 1 Schedule 1	pian asers.	
Highest erosion risk land (plantation	New	Select stance	Freshwater		
forestry)					
Highest erosion risk land (pasture)	New	Select stance	Freshwater		
High erosion risk land (pasture)	New	Select stance	Freshwater		
Highest erosion risk land (woody	New	Select stance	Freshwater		
vegetation)					
Hydrological control	New	Select stance	Part 1 Schedule 1		
Impervious surfaces	New	Select stance	Part 1 Schedule 1		
Intensive grazing	New	Amend	Freshwater	Management (Stock Exclusion) Regulations 2020 should be set out in full for ease of use, consistent with the PC1's treatment of the definition of	Amend: "Has the same meaning as set out in Regulation 3-4 of the Resource Management (Stock Exclusion) Regulations 2020: Meaning: (a) break feeding; or (b) grazing on annual forage crops; or (c) grazing on pasture that has been irrigated with water in the previous 12 months"
Limit Mechanical land preparation	New New	Select stance Select stance	Part 1 Schedule 1 Freshwater	"threatened species".	
Nationally threatened freshwater species	New	Amend	Part 1 Schedule 1	NPSFM refers to "threatened species" rather than "threatened freshwater	Amend to "nationally threatened species" or "threatened species"
				species". Some species that rely on freshwater for part of their lifecycle will not constitute a "freshwater species".	
Nitrogen discharge risk	New	Oppose	Freshwater	species that rely on freshwater for part of their lifecycle will not constitute a "freshwater species". Nitrogen discharge risk must include consideration of of biophysical factors	
Nitrogen discharge risk Part Freshwater Management Unit Primary contact sites	New	Oppose Select stance Select stance	Freshwater Freshwater Freshwater	species that rely on freshwater for part of their lifecycle will not constitute a "freshwater species". Nitrogen discharge risk must include consideration of of biophysical factors influencing nitrogen loss, and the sensitivity of the receiving environment to	Amend as follows: "The quantitative assessment of nitrogen loss risk as determend using a recognised risk assessment tool that addresses biophysical factors influencing nitrogen loss, and the sensitivity of the receiving environment to that nitrogen

Redevelopment Registration Registered forestry adviser Replanting Sacrifice paddocks	New New New New New	Select stance Select stance Select stance Select stance Select stance	Part 1 Schedule 1 Freshwater Freshwater Freshwater Freshwater	assessment tools have been the subject of contention in terms of efficacy. The lack of reference to a widely acceptable tool remains a gap in the plan. It is therefore not appropriate to delegete to Councils the ability to approve a tool, and a plan change or variation will be required to include such a tool. Reference to full text better assists plan users. The meaning set out in Regulation 3 of the Resource Management (National	The tool that provides a quantitative assessment of risk of difuse nitrogen discharge from rural land that has been included in the plan using a plan change or variation has been approved for use as a recognised risk assessment tool by the Wellington Regional Council. Include full text of definition. Include the actual text of Regulation 3 in the Plan itself: means an area on which— (a) cattle are repeatedly, but temporarily, contained (typically during extended periods of wet weather); and (b) the resulting damage caused to the soil by pugging is so severe as to require resowing with pasture species
 Small stream riparian programme	New	Select stance	Freshwater		
Stabilisation	New	Select stance	Part 1 Schedule 1		
 Stormwater	Amended	Select stance	Part 1 Schedule 1		
	New	Select stance	Part 1 Schedule 1		
Stormwater management strategy	New	Select stance	Part 1 Schedule 1		
Stormwater network	Amended	Select stance	Part 1 Schedule 1		
		 			
Stormwater treatment system		Select stance	Part 1 Schedule 1		
Stocking rate	New	Support	Freshwater	Helps give effect to NPSFM provisions	Retain.

	Stock unit	New	Support	Freshwater	Helps give effect to NPSFM provisions	Retain.
	Unplanned greenfield development	New	Select stance	Part 1 Schedule 1	D 6	
	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	New	Amend	Freshwater	Reference to full text better assists plan users.	Set text of definition for "vegetation clearance" in full.
	Wastewater network catchment or sub- catchment	New	Select stance	Part 1 Schedule 1		
	Wet weather overflows	New	Select stance	Part 1 Schedule 1		
	Whaitua	Amended	Select stance	Part 1 Schedule 1		
	Winter Stocking rate	New	Support	Freshwater	Helps give effect to NPSFM provisions	Retain.
3 Objectives	Amendments to Chapter 3 - Objectives	Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O2	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O5	Not applicable to Whaitua	Select stance	Freshwater		
	Objective O6	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O17	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O20	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O34	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O35	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O36	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O37	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O38	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	3.6 Water quality	Amended/Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.		Select stance	Part 1 Schedule 1		
	Table 3.1 Primary contact recreation and Māori customary use objectives in freshwater bodies.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.2 Secondary contact and Māori customary use recreation objectives in freshwater bodies.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.3 Contact recreation and Māori customary use objectives in coastal water.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	3.7 Biodiversity, aquatic ecosystem health and mahinga kai	Amended/Not applicable to Whaitua		Part 1 Schedule 1		

Objective Odo, Biedinansky assetie	l A a d a d	I A a al	7pa.u. 4 Cabaadula 4	//	
Objective O19: Biodiversity, aquatic	Amended	Amend	Part 1 Schedule 1		Carry parameters through to new tables for the whaitua. See relief sought below
ecosystem health and mahinga kai in fresh				1	for table 3.4 and the new table on water quality in the new Whaitua chapters.
water bodies and the coastal marine area				quality are still	
are safeguarded.				relevant to the	
				Whaitua and have	
				not been carried	
				over to the new	
				target tables.	
Table 3.4 Rivers and Streams.	Not applicable to	Oppose	Part 1 Schedule 1	Key parameters in	Retain the application of nuisance macrophytes, periphyton cover, toxicants, and
	Whaitua			table 3.4 for water	mahinga kai targets to the new whaitua chapters.
				quality are still	
				relevant to the	
				Whaitua and have	
				not been carried	
				over to the new	
Table 2.5 Lakes	Not applicable to	Calantatana	Davit 1 Calcadula 1	target tables.	
Table 3.5 Lakes.	1 ''	Select stance	Part 1 Schedule 1		
T-11-2 C C 1	Whaitua		Decid Col. 1.1.1	This is selled to the	But the configuration of table 2 Constitution in the constitution
Table 3.6 Groundwater.		Oppose	Part 1 Schedule 1		Retain the application of table 3.6 to the Whaitua. Amend to include nitrate-
	Whaitua			to the Whaitua	nitrogen target of < 1.0 mg/L to protect ecosystem health and drinking water.
				and no	
				replacement	
				targets have been	
Table 3.7 Natural wetlands.	Amended	Amend	Part 1 Schedule 1	This is still relevant	Retain the application of table 3.7 to the Whaitua. Add the wetland condition
				to the Whaitua	index as a measure of wetland ecosystem health and set a target of 10.
				and no	
				replacement	
				targets have been	
				provided.	
				Amendment is	
				needed to provide	
				clearer target	
				states using the	
				wetland condition	
Table 3.8 Coastal waters.	1 ''	Amend	Part 1 Schedule 1	Key parameters in	Retain the application of attributes which are in this table but not in the new table
	Whaitua				8.1 and 9.1 (or carry them through to the new tables).
				relevant to the	
				Whaitua and have	
				not been carried	
				over to the new	
				target tables.	
				These should be	
				retained to give	
				effect to NPSFM	
				and NZCPS.	
3.8 Sites with significant values	Amended		Part 1 Schedule 1		
Objective O25: Outstanding water bodies	Amended	Select stance	Part 1 Schedule 1		
identified in Schedule A (outstanding water					
bodies) and their significant values are					
protected and restored.					
protected and restored.			1		

		T	1	- ·		
	Objective O28: Ecosystems and habitats	Amended	Select stance	Part 1 Schedule 1		
	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.			D 1461 114		
		Not applicable to		Part 1 Schedule 1		
		Whait / Not				
		applicable to				
		Whaitua Te				
4 Policies		Awarua-o-Porirua				
	Policy P65: National Policy Statement for	Not applicable to	Select stance	Freshwater		
	Freshwater Management requirements for	Whaitua				
	discharge consents.					
		Not applicable to	Select stance	Part 1 Schedule 1		
	,	Whaitua	Jereet stance	, are a seriedule a		
			Coloct stance	Dart 1 Cabadula 1		
		Not applicable to	Select stance	Part 1 Schedule 1		
		Whaitua		<u> </u>		
	Policy P72: Priority Catchments.	Not applicable to	Select stance	Freshwater		
		Whaitua				
	Policy P73: Implementation of farm	Not applicable to	Select stance	Freshwater		
	environment plans in priority catchments.	Whaitua				
	Policy P74: Avoiding an increase in adverse	Not applicable to	Select stance	Part 1 Schedule 1		
	effects of rural land use activities and	Whaitua				
	associated diffuse discharges of					
	contaminants.					
		Not applicable to	Select stance	Part 1 Schedule 1		
		Whaitua				
	· · · · · · · · · · · · · · · · · · ·	Not applicable to	Select stance	Part 1 Schedule 1		
		* *	Select starice	Tart I Schedule I		
	· ·	Whaitua				
	use.	.				
	Policy P79: Quality of point source	Not applicable to	Select stance	Freshwater		
	<u> </u>	Whaitua				
	Policy P82: Avoiding inappropriate	Not applicable to	Select stance	Part 1 Schedule 1		
	Š	Whaitua				
	Policy P83: Minimising adverse effects of	Not applicable to	Select stance	Part 1 Schedule 1		
	stormwater discharges.	Whaitua			 	
	Policy P84: Managing land use impacts on	Not applicable to	Select stance	Part 1 Schedule 1		
	stormwater.	Whaitua				
		Not applicable to	Select stance	Part 1 Schedule 1		
		Whaitua				
	authority and state highway network					
	consents.					
		Not applicable to	Coloct stance	Dart 1 Cabadula 1		
	Policy P86: Second-stage local authority and		Select stance	Part 1 Schedule 1		
	<u> </u>	Whaitua	le de la constant	De da Calanda		
		Not applicable to	Select stance	Part 1 Schedule 1		
		Whaitua	<u> </u>	<u> </u>		
	-	Not applicable to	Select stance	Part 1 Schedule 1		
	discharge stormwater containing	Whaitua				
	wastewater.				 	
	Policy P118: Water takes at minimum flows	Not applicable to	Select stance	Freshwater		
	and minimum water levels.	Te Awarua-o-				
		Porirua Whaitua				
		. J d.d TTTTaltad	L		l	

		T		_		
	Policy P121: Core allocation for rivers.	Not applicable to	Select stance	Freshwater		
		Te Awarua-o-				
		Porirua Whaitua				
	4.6 Biodiversity, aquatic ecosystem health	Amended		Part 1 Schedule 1		
	and mahinga kai.					
		Amended	Select stance	Part 1 Schedule 1		
	health and mahinga kai.					
	Policy P36: Restoring Wairarapa Moana	Amended	Select stance	Part 1 Schedule 1		
	4.7.3 Sites with significant indigenous	Amended		Part 1 Schedule 1		
	biodiversity value.					
	Policy P45: Protecting trout habitat.	Amended	Select stance	Part 1 Schedule 1		
	4.9.1 Discharges to land and water.	Amended		Part 1 Schedule 1		
	Policy P78: Managing point source	Amended	Select stance	Part 1 Schedule 1	The note in Policy	Delete the word "note"
	discharges for aquatic ecosystem health				78 needs to be part	
	and mahinga kai.				of the policy proper	
					to ensure it gives	
					effect to NPSFM	
1					direction	
5.1 Air quality rules	5.1.2 Outdoor burning.	Amended		Part 1 Schedule 1		
	Rule R1: Outdoor burning – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R3: Outdoor burning for firefighter training – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.4 Large scale combustion activities.	Amended		Part 1 Schedule 1		
	Rule R7: Natural gas and liquefied	Amended	Select stance	Part 1 Schedule 1		
	petroleum gas – permitted activity.					
	Rule R8: Diesel or kerosene blends –	Amended	Select stance	Part 1 Schedule 1		
	permitted activity.					
	Rule R9: Biogas – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R10: Untreated wood – permitted	Amended	Select stance	Part 1 Schedule 1		
	activity.					
	Rule R11: Coal, light fuel oil, and petroleum	Amended	Select stance	Part 1 Schedule 1		
	distillates of higher viscosity – permitted					
	activity.					
	Rule R12: Emergency power generators –	Amended	Select stance	Part 1 Schedule 1		
	permitted activity.					
	5.1.5 Chemical and metallurgical	Amended		Part 1 Schedule 1		
	processes.					
	Rule R14: Spray coating within an enclosed	Amended	Select stance	Part 1 Schedule 1		
	space – permitted activity.					
	Rule R15: Spray coating not within an	Amended	Select stance	Part 1 Schedule 1		
	enclosed space – permitted activity.					
	Rule R16: Printing processes – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R17: Dry cleaning – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R18: Fume cupboards – permitted	Amended	Select stance	Part 1 Schedule 1		
	activity.					
	Rule R19: Workplace ventilation –	Amended	Select stance	Part 1 Schedule 1		
	permitted activity.					
	Rule R20: Mechanical processing of metals	Amended	Select stance	Part 1 Schedule 1		
	 permitted activity. 					
	Rule R21: Thermal metal spraying –	Amended	Select stance	Part 1 Schedule 1		
	permitted activity.					
	5.1.7 Dust generating activities.	Amended		Part 1 Schedule 1		

	T		7		
Rule R25: Abrasive blasting within an	Amended	Select stance	Part 1 Schedule 1		
enclosed booth – permitted activity.					
Rule R26: Abrasive blasting outside an	Amended	Select stance	Part 1 Schedule 1		
enclosed area – permitted activity.					
Rule R27: Handling of bulk solid materials –	Amended	Select stance	Part 1 Schedule 1		
permitted activity.					
Rule R28: Cement storage – permitted	Amended	Select stance	Part 1 Schedule 1		
activity.					
5.1.8 Food, animal or plant matter	Amended		Part 1 Schedule 1		
manufacturing and processing.					
Rule R29: Alcoholic beverage production –	Amended	Select stance	Part 1 Schedule 1		
permitted activity.					
Rule R30: Coffee roasting – permitted	Amended	Select stance	Part 1 Schedule 1		
activity.					
Rule R31: Food, animal or plant matter	Amended	Select stance	Part 1 Schedule 1		
manufacturing and processing – permitted					
activity.					
5.1.9 Fuel storage	Amended		Part 1 Schedule 1		
Rule R33: Petroleum storage or transfer	Amended	Select stance	Part 1 Schedule 1		
facilities – permitted activity.					
5.1.10 Mobile sources.	Amended		Part 1 Schedule 1		
Rule R34: Mobile source emissions –	Amended	Select stance	Part 1 Schedule 1		
permitted activity.					
5.1.11 Gas, water and wastewater	Amended/New		Part 1 Schedule 1		
processes.	/ Interfaced, ivew		T dit I seriedale I		
Rule R35: Water and wastewater processes	Amended	Select stance	Part 1 Schedule 1		
 permitted activity. 					
Rule R35A: Gas processes – permitted	New	Select stance	Part 1 Schedule 1		
activity.					
5.1.12 Drying and kiln processes.	Amended		Part 1 Schedule 1		
Rule R36: Drying and heating of minerals –	Amended	Select stance	Part 1 Schedule 1		
permitted activity.					
5.1.13 Discharge of agrichemicals.	Amended		Part 1 Schedule 1		
General conditions for the discharge of	Amended	Support	Part 1 Schedule 1	Creates more	Retain as proposed.
agrichemicals.				consistency with	
				NZCPS and with	
				NPSFM	
				requirements to	
				manage receiving	
			<u> </u>	environments	
Rule R37: Handheld discharge of	Amended	Select stance	Part 1 Schedule 1		
agrichemicals – permitted activity.					
 Rule R38: Motorised and aerial discharge of	Amended	Select stance	Part 1 Schedule 1		
agrichemicals – permitted activity.			<u> </u>		
Rule R39: Agrichemicals not permitted –	Amended	Select stance	Part 1 Schedule 1		
restricted discretionary activity.			<u> </u>		
5.1.14 Fumigation.	Amended		Part 1 Schedule 1		
Rule R40: Fumigation – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
5.1.15 All other discharges	Amended		Part 1 Schedule 1		
Rule R42: All other discharges –	Amended	Select stance	Part 1 Schedule 1		
discretionary activity.					
5.2 and 5.3 Discharges to land and water	Not applicable to		Part 1 Schedule 1		
and land use rules	Whaitua				
Rule R48: Stormwater from an individual	Not applicable to	Select stance	Part 1 Schedule 1		
property – permitted activity.	Whaitua		<u> </u>		
				-	

Rule R49: Stormwater from new subdivision	Not applicable to	Select stance	Part 1 Schedule 1		
and development – permitted activity.	Whaitua				
Rule R50: Stormwater from new subdivision	Not applicable to	Select stance	Part 1 Schedule 1		
and development – restricted discretionary	Whaitua				
activity.					
Rule R51: Stormwater to land – permitted	Not applicable to	Select stance	Part 1 Schedule 1		
activity.	Whaitua				
Rule R52: Stormwater from a local authority		Select stance	Part 1 Schedule 1		
or state highway network – controlled	Whaitua	Sciect Starice	l art i schedule i		
activity.	Wilaitaa				
Rule R53: Stormwater from a local authority	Not applicable to	Select stance	Part 1 Schedule 1		
•	Whaitua	Select stallce	rait i schedule i		
or state highway network with a	vviiditud				
stormwater management strategy –					
restricted discretionary activity.	Niet englischie te	Calaatataaaa	Davit 4 Calaaduda 4		
Rule R54: Stormwater from a port or airport	• •	Select stance	Part 1 Schedule 1		
- restricted discretionary activity.	Whaitua	Calaaketee	Dant 4 Calculated		
Rule R55: All other stormwater –	• •	Select stance	Part 1 Schedule 1		
· · · ·	Whaitua		<u> </u>		
Rule R56: Water races – discretionary		Select stance	Freshwater		
,	Whaitua				
Rule R57: Existing pumped drainage		Select stance	Part 1 Schedule 1		
schemes – permitted activity.	Whaitua				
Rule R58: All other pumped drainage	• •	Select stance	Part 1 Schedule 1		
schemes – discretionary activity.	Whaitua				
_	Not applicable to	Select stance	Part 1 Schedule 1		
and fresh water – discretionary activity.	Whaitua				
Rule R66: Discharges of wastewater to fresh	Not applicable to	Select stance	Freshwater		
water – non-complying activity.	Whaitua				
Rule R68: Discharge of treated wastewater	Not applicable to	Select stance	Part 1 Schedule 1		
from a wastewater network – restricted	Whaitua				
discretionary activity.					
Rule R101: Earthworks – permitted activity.	Not applicable to	Select stance	Part 1 Schedule 1		
	Whaitua				
Rule R102: Construction of a new farm	Not applicable to	Select stance	Freshwater	 	
track – permitted activity.	Whaitua				
Rule R103: Construction of a new farm	Not applicable to	Select stance	Freshwater		
track – controlled activity.	Whaitua				
Rule R104: Vegetation clearance on erosion		Select stance	Freshwater		
prone land – permitted activity.	Whaitua				
Rule R105: Vegetation clearance on erosion		Select stance	Part 1 Schedule 1		
prone land in accordance with a Freshwater					
Farm Plan – permitted activity.					
Rule R106: Earthworks and vegetation	Not applicable to	Select stance	Freshwater		
clearance for renewable energy generation	• •				
- restricted discretionary activity.					
and					
Rule R107: Earthworks and vegetation	Not applicable to	Select stance	Part 1 Schedule 1		
_	Whaitua	2.000 000.100			
Rule R110: Use of rural land in priority		Select stance	Freshwater		
catchments – permitted activity.	Whaitua	Sciect staile	1 7 CSTIWATET		
Rule R111: Use of rural land in priority		Select stance	Freshwater		
catchments – controlled activity.	Whaitua	Sciect Stance	. resilwater		
cateminents – controlled activity.	vviiaitua				

Rule R112: Use of rural land in priority catchments – discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
5.4.4 Uses of beds of lakes and rivers general conditions.	Amended		Part 1 Schedule 1		
Beds of lakes and rivers general conditions.	Amended	Support	Part 1 Schedule 1	Increases clarity	Retain as proposed.
5.4.5 Uses of beds of lakes and rivers.	Amended		Freshwater		
Rule R128: New structures – permitted activity.	Amended	Amend	Freshwater	While R128 has been narrowed to no longer include "erosion protection structures" (and we support this narrowing), it still provides for "debris arrestor structures" and "structures associated with vegetative edge protection". up to a size of 10m2. This is large enough to alter the natural character and habitat of the river, and frustrates the ability of the plan to achieve outcomes directed by NPSFM Policy 7 (loss of river extent and values is avoided) and	Remove permitted status for "debris arrestor structures" and "structures associated with vegetative edge protection" to ensure these activities are managed in a way that maintains and restores physical habitat in riverbeds and natural form and character. Introduce a condition of the rule (in the general conditions) that requires compliance with Target Attribute States (which should be amended to include habitat and natural form and character targets - see relief sought elsewhere).

Bula P123: Minor cand and gravel	Amended	Amond	Freshwater	Compliance with	Amond general conditions on above rule. See relief sought above /and introduce
Rule R132: Minor sand and gravel	Amended	Amend	Freshwater	Compliance with	Amend general conditions on above rule. See relief sought above. (and introduce
extraction – permitted activity.				target attribute	target states for habitat and natural form and character - see relief sought
				states is required	elsewhere).
				to give effect to	
				NPSFM Policy 7	
				(loss of river extent	
				and values is	
				avoided) and	
				Policy 9 (habitats	
				of indigenous	
				freshwater species	
				are protected), as	
				well as the	
				requirement to	
				manage water	
				bodies to achieve	
				all five components	
				of ecosystem	
				health, which	
				includes habitat	
				(physical form, etc)	
				and to potentially	
				manage for	
				natural form and	
				character as an	
				additional value.	
				And NRP Policy 30,	
				which includes	
Rule R133: Gravel extraction for flood	Amended	Amend	Freshwater	R133 provides a	Include Schedule A1, A2, and A3 in R133 as areas where excavation, deposition,
protection purposes or erosion mitigation				level of discretion	or disturbance are discretionary activities.
inside sites of significance – discretionary				and potential	
activity.				protection that	
delivity.				should be provided	
				more widely to	
				other water	
				bodies, particularly	
				Outstanding	
				Waterbodies, in	
				order to ensure	
				consistency with	
				NPSFM Policy 7	
				and 9, and	
				requirements to	
				manage habitat	
				and natural form	
				and character,	
				including NRP	
C 4.7 All other was a stable by the first	A ma a m cl = -l		Down 1 Calcard Lond	Policy 30.	
5.4.7 All other uses of the beds of lakes	Amended		Part 1 Schedule 1		
and rivers.					

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		Amended	Amend	Part 1 Schedule 1	Prohibited activity	Remove the word "note".
	beds – discretionary activity.				status provides the	
					most certainty that	Make placement of passive gates prohibited (i.e., strengthen rule beyone NES
					critical policy	minimum).
					direction under the	
					NPSFM and	
					ultimately the RMA	
					are achieved, and	
					protects fish	
					passage.	
	Ţ Ţ	New	-	Freshwater		
		New	Oppose	Freshwater	This is to see the all a	Make discretionary.
	permitted activity.				This rule could allow a	
					diversion once in	
					place to continue	
					indefinitely, no matter	
					the size or effects.	
					These diversions	
					should be subject to	
					assessments and	
					consenting to ensure	
					effects on natural	
					form and character	
					and habitat in	
					particulare are	
					managed, as well as	
					ecosystem health and	
					Te Mana o te Wai.	
					Permitted activity	
					status is inapprorpiate	
					and council needs	
					scope to manage	
					potential ongoing	
					effects.	
	5.5 Water allocation rules	Not applicable to		Freshwater		
		Te Awarua-o-				
		Porirua Whaitua				
		Not applicable to	Select stance	Freshwater		
		Te Awarua-o-				
	•	Porirua Whaitua				
			Select stance	Freshwater	1	
		Te Awarua-o-	Jeicet Starice	CSITWALCT		
	_ · · · · · · · · · · · · · · · · · · ·	Porirua Whaitua				
			Calagetic	Faraba et e		
	Rule R154: Water races – permitted activity.		Select stance	Freshwater		
		Te Awarua-o-				
		Porirua Whaitua				
			Select stance	Freshwater		
	controlled activity.	Te Awarua-o-				
		Porirua Whaitua			<u> </u>	
	Rule R158: All other take and use –	Not applicable to	Select stance	Freshwater		
		Te Awarua-o-				
		Porirua Whaitua				
6 Other methods		New		Freshwater		
5 Julie methods	oleo i resilitatei Action i ian programme	11CVV		Convacci		

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Method M36: Freshwater Action Plan	New	Support			Retain as proposed.
programme.				with NPSFM	
					Note Forest & Bird's submission point on Schedule 27 A2 that seeks the inclusion
					of direction to prepare action plans for habitat and natural form and character in
					rivers and streams.
Method M37: Freshwater Action Plan for	New	Support	Freshwater		Retain as proposed.
the Parangarahu Lakes.				with NPSFM	
				direction.	
Method M38: Freshwater Action Plan for	New	Support	Freshwater		Retain as proposed.
the Rangituhi catchment.				with NPSFM	
				direction.	
Method 39: Freshwater Action Plan for	New	Support	Part 1 Schedule 1		Retain as proposed.
Nationally Threatened freshwater species				with NPSFM	
within Whaitua Te Whanganui-a-Tara and					Note Forest & Bird's submission point on Schedule 27 A2 that seeks the inclusion
Te Awarua-o-Porirua Whaitua.				particular Policies 7	of direction to prepare action plans for habitat and natural form and character in
				and 9, the	rivers and streams to then ensure this method is carried through to and
				requirements to	consistent with the schedule.
				protect habitat as	
				a component of	
				ecosystem health,	
				and NRP Policy 30.	
Method M40: Fish passage action plan	New	Amend	Freshwater	Prioritisation of	Amend M40 (b) to state
programme for Whaitua Te Whanganui-a-				areas for	
Tara and Te Awarua-o-Porirua Whaitua.				restoration of fish	"(b) prioritising remediation of fish passage (if appropriate to protect species) in
				passage should be	locations highly valued for their indigenous fish and mahinga kai species in places
				-	where this would provide access to high quality habitat or large areas of
					habitat"
				the	
				catchment/area	
				AND the area and	
				quality of the	
				habitat that would	
				become available	
				(e.g., there may be	
				little point in	
				opening up access	
				to poor habitat just	
				because their are	
				valuable species	
				downstream, as	
				outcomes for them	
				may be better	
				improved by	
				restoring access to	
				higher quality	
				habitat elsewhere).	
			<u> </u>		
Method M41: Identifying and responding to	New	Support	Freshwater		Retain as proposed.
degradation in freshwater bodies within				with NPSFM	
Whaitua Te Whanganui-a-Tara and Te				direction.	
Awarua-o-Porirua Whaitua.					
6.17 Small farm property registration	New		Freshwater		

	Method M42: Small farm property	New	Select stance	Freshwater		
	registration within Whaitua Te Whanganui-		Sciedt Staile	Tresimate.		
	a-Tara and Te Awarua-o-Porirua Whaitua.					
	6.16 Supporting improved water quality	New		Part 1 Schedule 1		
	outcomes.					
	Method M43: Supporting the health of	New	Amend	Part 1 Schedule 1	The RMA definition	Amend chapeau as follows:
	urban waterbodies.				of "waterbody"	Wellington Regional Council will undertake programme(s) to support the health of
					does not capture	waterbodies and coastal water, including rivers and streams, wetlands, estuaries
					estuaries or	and harbours, impacted by urban activities, including to:
					harbours.	Amend (b)(ii): investigate options to reduce the hydrological impacts on
						freshwater bodies and coastal water of stormwater capture
					Reference to	
					wetlands is	Include in M43 (b) (i) that education materials will also be targetted at the public
					· ·	to cover activities like washing cars on driveways and on the street, pool water
					1 **	discharges, etc.
					policy 6, and	
					section 3.22.	Include in M43 (a) that GWRC will investigate how it can strengthen stormwater,
						waste, and trade waste bylaws to reduce pollution, including from car washing on
					The method does	driveways and streets.
					not go far enough	
					to direct GWRC to	Include direction to investigate regulating / requiring water sensitive design,
					manage pollution	rather than just providing 'education' on it, if this is not included through this plan
					from the public	change elsewhere.
					and the potential	
					need to strengthen	
					bylaws related to	
					urban pollution.	
	Method M44: Supporting the health of rural	New	Amend	Part 1 Schedule 1	1	Amend chapeau as follows:
	waterbodies.				1 *	Wellington Regional Council, working with primary sector organisations, will
					· ·	undertake a programme(s) to support the health of waterbodies and coastal
					estuaries or	water, including rivers, streams, wetlands, estuaries and harbours, impacted by
					harbours.	rural activities, including to:
					Poforonco to	Add a now point "(a) investigate entions including financial compact and mater
					Reference to wetlands is	Add a new point "(e) investigate options, including financial support and rates
						relief options, education, advice, and provision of plants, to encourage and enable wetland restoration"
					required to give effect to NPSFM	enable wetially restoration
					policy 6, and	
					section 3.22.	
	Method M45: Funding of wastewater and	New	Support	Part 1 Schedule 1	Additional funding	Retain.
	stormwater network upgrades	INCVV	σαρροιτ	i ai i i scriedule i	and investment will	inctuiii.
	Stormwater network upgrades				be required to	
					meet outcomes.	
8 Whaitua Te Whanganui-a-T	8.1 Objectives	New		Both	meet outcomes.	
o stricted to thiningaliara-1	oli objectives			2001		

	Objective WH.O1: The health of all	New	Amend	Part 1 Schedule 1	The explanation of	Amend chapeau: "The health of all freshwater bodies, ephemeral watercourses,
f	freshwater bodies and the coastal marine				the wai ora state is	and the coastal marine area"
	area within Whaitua Te Whanganui-a-Tara				treated as a note	
ļ	is progressively improved and is wai ora by				and should form	Delete the word "note".
	2100.				part of the	
					objective itself.	Retain the balance of the objective.
					"Notes" (or	
					"explanatory	Amend the target timeframe to be 2050, or to provide part-FMU / catchment
					notes" or	specific timeframes that account for the relative ease/difficulty of achieving
					"guidance notes")	targets in different catchments.
					can be argued to	
					have no legal	
					force. It is	
					important that the	
					definition of "wai	
					ora state" has legal	
					effect and is not	
					undermined.	
					2100 is too far	
					away as a target	
					for achieving wai	
					ora. Biodiversity	
					loss and climate	
					change are at	
					critical levels and	
					have become	
					existential threats.	

Objective WH.O2: The health a of Te Whanganui-a-Tara's grou rivers and natural wetlands and margins are on a trajectory of r	ndwater, I their neasurable	Amend	Freshwater	2040 is too far away as a target for achieving "maintained"	Amend as follows: 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, such that by 2030 2040:
improvement towards wai ora.				water quality. The intent of the Essential Freshwater program was to halt freshwater degradation and "Start making immediate improvements so water quality improves within five years". Biodiversity loss and climate change are at critical levels and have become existential threats. More ambition is required. Ephemeral watercourses should also be	Include reference to natural form and character in the objective (under (a)) and refer to ecosystem health as it is more consistent with NPSFM. i.e., "(a) water quality, habitats, natural form and character are at a level where the state of aquatic life ecosystem health is meaningfully improved"
Objective WH.O3: The health a of coastal water quality, ecosys habitats in Te Whanganui-a-Tai maintained or improved to ach coastal water objectives set ou 8.1.	ra is ieve the	Oppose	Part 1 Schedule 1	Timeframe is too far away to ensure that the coastal values in Te Whanganui-a-Tara are not compromised or lost.	Amend timeframe for achievement to 2030.
Table 8.1 Coastal water objecti	ves. New	Oppose	Part 1 Schedule 1	Key coastal water quality parameters are missing and more stringent timeframes are required	Include a parameter for Turbidity (Unit: NTU; Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser; Te Whanganui-a-Tara Harbour and estuaries, Makara Estuary, Wainuiomata Estuary: <6.9; Wai Tai: No discernible change) Add further parameters (for example lead, dissolved oxygen, temperature, pH, secchi depth, chlorophyll-a, total phosphorous, total nitrogen, nitrite-nitrate nitrogen, ammoniacal nitrogen, and faecal coliforms) to ensure narrative objectives in Table 3.8 of the Operative Plan are met. Amend Wai Tai unit for Enterococci: <200 <40 Add interim timeframes as per NPSFM 3.11.

Objective WH.O4: The extent, condition,	New	Oppose	Part 1 Schedule 1	NPSFM refers to	The extent, condition, and connectivity of habitats of nationally threatened
and connectivity of habitats of nationally				"threatened	freshwater species are increased, and the long-term population numbers of
threatened freshwater species are				species" (Appendix	these species and the area over which they occur are increased, improving their
increased and the long-term population				1A) rather than	threat classification status.
numbers of these species and the area over				"threatened	
which they occur are increased, improving				freshwater	Retain balance of policy to provide direction for protection and monitoring of
their threat classification status.				species"	habitat.
				("freshwater	
				species" generally	
				are refered to in	
				Policy 9). Some	
				threatened species	
				that rely on	
				freshwater for part	
				of their lifecycle	
				may not constitute	
				a "freshwater	
				species".	
				Amendment also	
				needed to	
				definition.	
				Providing a	
				standalone	
				objective for	
				habitat ensures	
				implementation of	
				NPSFM policy 7	
				and 9, and	
Objective WH.O5: By 2040 the health and	New	Amend	Freshwater	Timeframe is too	Amend timeframe for achievement to 2030.
wellbeing of the Parangarahu Lakes and				far away to ensure	
associated natural wetlands are on a				that the coastal	
trajectory of improvement towards wai ora.				values are not	
				compromised or	
				lost.	

Table 8.2 Target attribute states for lakes.	New	Oppose	Freshwater	Table 8.2 fails to	Amend Table 8.2 to include the attributes from Table 3.5 which previously applied
				carry through	but have not been carried over - including sediment, mahinga kai, fish, and
				important	macroalgae.
				measures of lake	
				ecosystem health	Amend the timeframe for achievement of states to 2030, and/or set out interim
				from Table 3.5 of	target states if the timeframe remains 2040.
				the NRP, including	
				mahinga kai.	
				The NPSFM	
				requires that if	
				Target Attribute	
				States are set for a	
				long term, interim	
				states must be set	
				out. Table 8.2 sets	
				out targets for	
				2040, therefore	
				there should be	
				interim states set	
				out for 2033 at the	
				latest.	
Objective WH.O6: Groundwater flows and	New	Support	Freshwater	Gives effect to the	Retain as proposed
levels, and water quality, are maintained.				NPSFM 2020	
Objective WH.O7: The physical integrity of	New	Support	Freshwater	Gives effect to the	Retain as proposed
aquitards is protected so that confined				NPSFM 2020	
aquifer pressures are maintained.					
Objective WH.O8: Primary contact sites	New	Amend	Freshwater	2040 is too far	Shorten timeframe to 2030
within Te Awa Kairangi/Hutt River,				away as a target	
Pākuratahi River, Akatarawa River and				for achieving "at	
Wainuiomata River are suitable for primary				least maintained"	
contact.				water quality. The	
				intent of the	
				Essential	
				Freshwater	
				program was to	
				halt freshwater	
				degradation and	
				"Start making	
				immediate	
				improvements so	
				water quality	
				improves within	
				five years". More	
				ambition is	
				required.	
		l	l	required.	

Table 8.3 Primary contact site o	objectives in New	Select stance	Freshwater	The NPSFM	Set targets for 2030 and outline date from which maintenance will be continued
rivers.				(section 3.11)	(as per NPSFM 3.11). If date remains 2040, set out interim states at no longer
				requires that if	than 10-year intervals.
				Target Attribute	
				States are set for a	
				long term, interim	
				states must be set	
				out, and if a state	
				is already	
				achieved, a date	
				for must be set out	\cdot
				from which	
				maintenance will	
				be continued.	
				Table 8.3 sets out	
				targets for 2040,	
				therefore there	
				should be interim	
				states set out for	
				2033 at the latest.	
Objective WH.O9: Water quality	y, habitats, New	Amend	Freshwater	Natural form and	Amend chappeau to include natural form and character - "Water quality, habitats,
water quantity and ecological p				character' is a key	natural form and character, water quantity and ecological processes" and then
rivers are maintained or improv	ved.			value of rivers and	amend Table WH.O9 to include physical habitat and natural form and character
				streams in the Te	attrbiutes.
				Whanganui-a-Tara	
				area and is	Retain balance of objective.
				directed as a	
				potential value in	
				Appendix 2B of the	
				NPSFM, along with	
				habitat in	
				Appendix 2A. To	
				protect habitat,	
				protection of	
				natural form and	
				character is	
				required.	

Table 8.4: Target attribute states for rivers.	New	Amend	Freshwater	is too high. More	State river type and class for each of the part FMUs Set a minimum target state for periphyton biomass for all part FMUs at NPSFM band of 120 mg chl-a (and retain higher targets where included). Amend nitrate toxicity target to be NPSFM 'A' band for all part FMUs. Retain DIN target states where they are set below 0.3 mg/L. Amend others to be 0.3 mg/L (median) for good rivers (type 1 and 4) 0.6 for medium rivers (type 2 and 3) and 1.0 for poor rivers (type 5 & 6). Minimum DIN target should be no higher than 1.0. Clearly define what fish community health as determined by experts actually means Set higher targets for MCI attributes Retain 'nuisance macrophytes', 'periphyton cover', mahinga kai, and toxicants attributes from table 3.4 Retain groundwater attributes from table 3.6 Amend table (or add another table) to include target attribute states for habitat and natural form and character using the Habitat Quality / Natural Character Index. Minimum targets should set out a target of maintenance of habitat quality / natural character (e.g., minimum ratio of current:reference condition of 1.0). Amend target timeframe to 2030 and outline date from which maintenance will be continued (as per NPSFM 3.11). If date remains 2040, set out interim states at no longer than 10-year intervals.
				protect ecosystem health. The table is	
				missing attributes	
8.2 Policies	New		Both	Evalicit provision	Amond (b) to road "roctoring babitate and natural form and sharester"
Policy WH.P1: Improvement of aquatic ecosystem health.	New	Amend		Explicit provision for natural form and character should be included. The policy should also include direction that "enhancement" of Ifows should be through limits and natural means, not 'stream augmentation' or managed aquifer recharge.	Amend (b) to read "restoring habitats and natural form and character" Amend (c) to include "by setting limitis and reducing allocation volumes in overallocated catchments, and by restoring natural form and character to promote natural aquifer recharge" Retain balance of policy.

achieve target attribute states and coastal water objectives. ### Company of the preceding development and for other preceding development in the property of the development in the property of the property dut the remoining policy direction in (a) is opposed. This policy effectively supports compensatory measures, by measures of transmission that individually or cumulatively continuous and the effects management hierarchy under the NSPFM. ### Policy WH P3: Freshwater Action Plans role in the health and wellooling of waterways. ### Policy WH P3: Freshwater Action Plans role in the health and wellooling of waterways. ### Policy WH P4: Achievement of the visual clarity target attribute states. ### Policy WH P4: Achievement of the visual clarity target attribute states. ### Policy WH P5: Localised adverse effects of New Oppose Part 1 Schedule 1 Policy WH P5 is Leadised-adverse effects of sent-adverse effects of sent-adverse effects of sent-adverse effects and caches an	Policy WH.P2 Management of activities to	New	Amend	Part 1 Schedule 1	The direction to	Amend (a) as follows:
water objectives. Image: Continuing policy direction in (i) Supported but the remaining policy direction in (ii) Supported but the remaining policy direction in (iii) Supported but the remaining policy supported but the remaining policy direction in (iii) Supported but the remaining policy supported but the remaining policy direction in (iii) Supported but the remaining policy direction in (iii) Supported but the remaining policy direction in (iii) Supported but the remaining supported but the remaining policy support subject to the remaining subject of the subject of supported but the remaining subject of the subject of supported but the remaining subject in (iii) Supported but the remaining subje			, interior			
development is supported but the termining policy direction in (a) is opposed. This policy effectively supports compensatory measures, by means of financial contributions, for stormwater outsimilation in a decline in water quality is prohibited." Amend clause (e) so that it refers to ophemeral watercourses, wetlands opposed. This policy effectively supports compensatory measures, by means of financial contributions, for stormwater control transport that is control to RIMA s107, he MZCPS, and the effects management. Nemonal contributions per service of the MSPM. Planchial contributions per service of the MSPM. Planchi	_				ľ '	
supported but the remaining policy direction in [ii] is apposed. This policy effectively supports compensatory measures, by measures, because (i) land use intensification that individually or cumulatively conditions, for stormwater contamination - on approach that is contrary to RMA \$107, the NZCPS, and the effects management hierarchy under the NSFFM. Financial contributions per se are not on "offset". Uvestock should be "Insures NPSFM Contributions per se are not on "offset". Uvestock should be "Insures NPSFM direction is met." Policy WH.P.9.* Freshwater Action Plans role in the health and wellbeing of waterways. Policy WH.P.9.* Achievement of the visual clarity target attribute states. New Amend Ereshwater Preshwater Ensures NPSFM direction is met. Ensures NPSFM requires interim timeframes to 2030 or provide interim goals interim timeframes for 2030 or pr	water objectives.				1* *	and requiring financial contributions as to offset adverse effects from residual
## Annead clause (e) so that it refers to ephemeral watercourses, wetlands apposed. This policy effectively supports compensatory measures. By means of financial contributions, for stormwater contamination - on approach that is contrary to RMA. ## Annead clause (e) band use intensification that individually or cumulatively to a decline in water quality is prohibited. Add a clause "(i) land use intensification that individually or cumulatively measures. By means of financial contrary to RMA. ## AND PRINCES, and the effects management hierarchy under the NSPFM. ## Intensical contributions per se are not an office of the effects of financial contributions per se are not an office of the effects of financial contributions per se are not an office of the effects of the effects of the effects of the effects of pents of the effects of the effec					1	l ' ~
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Add a clause "(i) land use intensification that individually or cumulatively measures, by means of financial contributions, for stormwater contomination - on approach that is contrary to RMA s107, the NZCPS, and the effects management hierarchy under the NSPFM. Financial contributions per se are not an "offset". Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways. Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways. Policy WH.P4: Achievement of the visual clarity target attribute states. Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states. Policy WH.P5: Localised adverse effects of New Oppose Part 1 Schedule 1 Policy WH.P5: Localised adverse effects of point-source discharge					opposed. This	estuaries.
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Indiat course discharge I I I I I I I I I I I I I I I I I I I	point source discharge.	INEW	Oppose	rart i Schedule 1	•	The localised adverse effects of point source discharges to freshwater and coastal
	point source discharge.					water beyond the zone of reasonable mixing are avoided or minimised, including
from RMA s70 by avoiding:					I -	I
which is not					r	by avoiding.
expressly limited to						
point source						
discharges. Policy					ľ	
WH.P5 must be						
broadened to						
capture all						
discharges.					l '	

D. P. WILDO C		In .	Ic	De da Calenda de a		In
· ·		New	Support	Part 1 Schedule 1	Helps give effect to	Retain
of point source of	discharges.				NPSFM by	
					improving	
					discharge	
					management	
Policy WH.P7: Di	ischarges to groundwater.	New	Amend	Freshwater	Ensures	Retain and support policy with an objective with target attribute states for
					groundwater is	groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for
					protected and	groundwater to protect human and ecosystem health.
					restored to support	
					ecosystem health	
					and drinking water	
					values	
Policy WH.P8: A	voiding discharges of	New	Amend	Part 1 Schedule 1	The discharges	Add "(e) rubbish
specific products					referred to must be	(f) agrichemicals, fertilisers, persistent chemicals
					broadened to	(g) any other material that may kill fish"
					include anything at	[
					a concentration	
					that may kill fish.	
Policy WH.P9: G	eneral stormwater policy to	New	Amend	Part 1 Schedule 1	Additional	Amend to widen reference to include other toxicants, as per the NRP Table 3.4
	et attribute states and		, and a			(ANZG (2018) Default Guideline Values). i.e., "managed so that the baseline
coastal water ob					referred to to	water quality state for toxicants, including copper and zinc, is maintained, or
Coustal water on	Jeenves.				protect ecosystme	improved where degraded, including in the relevant"
					health. These are	improved where degraded, melading in the relevant
					already in place in	
					table 3.4 and	
					should be carried	
					through.	
Policy WILL P10. I	Managing adverse offerts of	Now	Cunnort	Dart 1 Cabadula 1		Retain
	Managing adverse effects of	inew	Support	Part 1 Schedule 1	Supports	Retain
stormwater disc	narges.				achievement of	
D. I'. 1441 D44 4	Stade and a facility of a sale	NI -	A I	Death Calculated	ecosystem health	Description of the state of the
	Discharges of contaminants	ivew	Amend	Part 1 Schedule 1	1 -	Require resource consent for discharges of stormwater from high risk areas
	om high risk industrial or				control are	
trade premises.					required where	
					stormwater is	
					coming from a	
					high risk location	
	Managing stormwater from	New	Amend	Part 1 Schedule 1	Higher levels of	Require resource consent for discharges of stormwater from high risk areas
a port or airport					control are	
					required where	
					stormwater is	
					coming from a	
					high risk location	
Policy WH.P13: I	Managing stormwater	New	Select stance	Part 1 Schedule 1		
	ges through a Stormwater					
Management Str	rategy.					
network dischar	ges through a Stormwater					

				1	
Policy WH.P14: Stormwater discharges	New	Amend	Part 1 Schedule 1	Reducing adverse	The adverse effects of stormwater discharges from new greenfield development
from new and redeveloped impervious				effects to "the	shall be minimised, and adverse effects of stormwater discharges from existing
surfaces.				extent practicable"	urban areas reduced to the extent possible practicable,
				enables cost	• • • · · · · · · · · · · · · · · · · ·
				considerations to	Insert explicit direction refering to and requiring water sensitive design for new
					and redeveloped areas.
				be factored into	land redeveloped areas.
				decision-makers,	
				which are too	
				often relied upon	
				to side-step taking	
				more	
				environmentally	
				responsible	
				approaches.	
				Reference to	
				1 1	
				"where possible" is	
				required.	
· ·	New	Oppose	Part 1 Schedule 1	Higher order	Amend to require adverse effects of residual stormwater contaminants to be
offsetting for new greenfield development.				direction (including	"avoided, remedied, or mitigated".
				both the NZCPS	
				and NPSFM) do not	
				provide for	
				offsetting and	
				compensation as	
				1 '	
				expressed in Policy	
				WH.P15. Further,	
				financial	
				contributions are	
				compensation and	
				not an offset.	
Policy WH.P16: Stormwater discharges	New	Support	Part 1 Schedule 1	The policy direction	Retain.
from new unplanned greenfield		''		reflects the NZCPS	
development.				and NPSFM 2020	
development.					
Policy WH.P17: General wastewater policy	New	Support	Part 1 Schedule 1	The notice direction	Retain. Note changes to timeframe may be required to ensure there and interim
	IACAA	Support	i art i Schedule I	1 ' '	, , ,
to achieve target attribute states and				*	timeframes consistent with NPSFM direction in s3.11.
coastal objectives.		<u> </u>		2020	
Policy WH.P18: Progressing works to meet	New	Support	Freshwater	The policy direction	Retain
Escherichia coli target attribute states.				reflects the NPSFM	
				2020	
 Policy WH.P19: Managing wastewater	New	Amend	Part 1 Schedule 1	Stronger policy is	Amend (c) to read "eliminate dry weather discharges by progressively reducing
network catchment discharges.				needed to give	the frequency and/or volume of dry weather discharges or the"
				effect to NPSFM	
Policy WH.P20: Managing existing	New	Amend	Part 1 Schedule 1	The policy only	Amend to include explicit point about reducing e coli loads where target states
wastewater treatment plant discharges.					are currently not met.
wastewater deathlent plant discharges.					are currently not men
				on maintaining or	
				improving	
				discharge quality	
				where targets are	
				already met.	
8.2.4 Rural land use and earthworks	New		Both		

Policy WH.P21: Managing diffuse	New	Amond	Freshwater	Ephemeral	"(d) excluding stock from water bodies, ephemeral watercourses, and the coastal
discharges of nutrients and Escherichia coli	inew	Amend	Freshwater	watercourses and	marine area as a limit on land use,"
from farming activities.				estuaries should	Infamile area as a minic on famo use,
Trom farming activities.				also be referred in	Retain balance of policy.
				· -	Retail balance of policy.
				clause (d) as these	
				can support high	
Della Mill D22 Construction of	NI -	0	F l l	ecological values	A consider the second constant of the second
Policy WH.P22: Capping, minimising and	New	Oppose	Freshwater	The policy only	Amend to provide council scope to require reductions in discharges from smaller
reducing diffuse discharges of nitrogen				directs reduction of	
from farming activities.				discharges on large	
				properties and	See relief sought for definition of "recognised nitrogen risk assessment tool".
				horticultural	
				properties. This	
				risks not capturing	
				discharges that	
				cumulatively are	
				significant. Also,	
				the efficacy of this	
				policy is contingent	
				on an adequate	
				nitrogen risk	
				assessment tool	
				which, per its	
				definition, is	
				proposed to be	
				(unlawfully)	
				delegated to	
				Council to approve.	
				Apart from these	
				aspects, Forest &	
				Bird is generally	
				supportive of the	
				remaining policy	
				direction.	
Policy WH.P23: Achieving reductions in	New	Support	Freshwater	Provides a	Retain
sediment discharges from farming activities		''		mechanism to	
on land with high risk of erosion.				reduce sediment	
Ů				loads and	
				therefore protect	
				rivers and receiving	
				environments from	
				the adverse effects	
				of sediment, which	
				is significantly	
				degrading habitat	
				and destroying Te	
				Awarua-o-Porirua	
				Awuruu-0-Porirud	
					<u> </u>

Dollar WILL D24. Dhasing of form	Mour	Amand	Dort 1 Cabadula 1	Deposited	Amond to include deposited codiment. "prioritiess these
Policy WH.P24: Phasing of farm environment plans.	New	Amend	Part 1 Schedule 1	sediment is also a	Amend to include deposited sediment - "prioritises those
lenvironment plans.					part Freshwater Management Units where Table 8.4 shows that suspended
				critical measure of	fine sediment or deposited fine sediment has a baseline state of D and/or where
				sediment	dissolved inorganic nitrogen is shown as being in need of improvement"
				movement through	
				thr catchment and	
				of ecological	
				consequences for	
				native species	
Policy WH.P25: Managing rural land use	New	Support	Freshwater	Helps give effect to	Retain
change.				NPSFM	
Policy WH.P26: Managing livestock access	New	Support	Freshwater	This additional	Include detail in the policy on where stock should be restricted from and by how
to small rivers.				direction is	much (e.g., 5m setback), and the frequency.
				required to ensure	, ,
				water quality	Extend application of policy to all FMUs and part FMUs to protect water quality.
				outcomes can be	дана,
				met, but should be	
				more specifric and	
				1	
				applied more	
				widely to manage	
				e coli and sediment	
				in all FMUs and	
				part FMUs.	
Policy WH.P27: Promoting stream shading.	New	Amend	Freshwater	The restoration of	Contribute to the achievement of aquatic ecosystem health by promoting
				stream shade can	requiring the progressive shading of streams where nutrient reductions alone will-
				improve water	be insufficient to achieve periphyton target attribute states.
				quality and habitat	
				in streams -	
				beyond just	
				assisting with	
				meeting	
				periphyton targets	
				(e.g., for	
				temperature, food	
				provision for fish,	
				leaf litter	
				provision). More	
				active and positive	
				direction on	
				stream shading is	
				also justified.	
Policy WH.P28: Achieving reductions in	New	Amend	Freshwater	Retirement of high	Include direction that large setbacks are required in areas of plantation forestry
sediment discharges from plantation				risk land is	and include a cap on the area logged in one harvest (or direct selective harvesting
forestry.				required to achieve	where not all trees are taken out). Retain (c) to assist in eventual retirement of
				water quality	highest risk land.
				outcomes. Larger	
				setbacks are	
				required and limits	
				on the area of	
				· ·	
				exposed soil are	
				also required.	

Policy WH.P29: Management of earthworks.	New	Amend		Setback distances from waterways (of 10 metres or more) are an effective method of ensuring fine seidment particles from earthworks are removed and to prevent adverse effects on ecosystems.	Add a new clause: (x) requiring setback distances, of no less than 10 metres, from surface water bodies, ephemeral watercourses, and the coastal marine area.
Policy WH.P30: Discharge standard for earthworks.	New	Amend	Part 1 Schedule 1	Controls on deposited sediment are also required	Amend to include (e) "the discharge shall not, after the zone of reasonable mixing, result in: (i) a change in deposited sediment cover of more than 20%, or (ii) an increase in deposited sediment to be more than 20% of the bed"
Policy WH.P31: Winter shut down of earthworks.	New	Support	Part 1 Schedule 1	Reduces risk of sediment degrading ecosystems	Retain
8.2.5 Water allocation	New		Freshwater		
Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te Whanganui-a-Tara.	New	Support	Freshwater	90% of MALF is consistent with proposed NES on Ecological Flows and Water Levels	Retain.
Policy WH.P33: Core allocation in Whaitua Te Whanganui-a-Tara.	New	Oppose		The NRP states over-allocation will be considered through the Whaitua Implementation Programme. This plan change is the result of that yet it does not amend the policy direction here. The flow and allocation limits for Whaitua Te Whanganui-a-Tara cannot be said to give effect to the NPSFM 2020 or achieve the purpose of the Act. Interim Interim limits need to be set to ensure life supporting capacity requirements for indigenous species are safeguarded.	

8.3 Rules	New		Both		
8.3.1 Discharges of contaminants	New		Part 1 Schedule 1		
Rule WH.R1: Point source discharges of specific contaminants – prohibited activity.	New	Support	Part 1 Schedule 1	Ensures NPSFM direction and water quality outcomes are met	Retain as proposed
8.3.2 Stormwater	New		Both		
Rule WH.R2: Stormwater to land – permitted activity.	New	Neutral	Freshwater		Retain
Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Support	Part 1 Schedule 1	Helps give effect to NPSFM and RMA	Retain
Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Support	Part 1 Schedule 1		Retain
Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Oppose	Part 1 Schedule 1	Rule WH.R5 contains elements that need to be subject to more Council oversight. Many elements, such as clause (h), are not sufficiently certain and enforceable for a permitted activity, and leave discretionary assessment to the plan user as to whether the activity is permitted or requires consent. Higher activity status and the addition of clearer and enforceable standards are required to ensure that both compliance with s 70 RMA is achieved	Reclassify Rule WH.R5 as a controlled activity and include alternative standards that are enforceable and distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification. Explicitly require 'water sensitive urban design' as a condition of consent (as per WH.R6), including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens.

greenfield impervious surfaces – controlled status is	as a discretionary activity and delete clause c.
activity. inappropriate,	
particularly as the	
rule has effect in	
the coastal	
environment	
where the NZCPS	
applies. The	
inability to refuse	
consent may not	
give effect to	
NZCPS directions	
and RMA s107(1).	
Higher activity	
status is required.	
Clause c should be	
deleted as it is	
inconsistent with	
the effects	
management	
Pule WILL B7. Stormwater from now and New Solect stones Part 1 Schodule 1	
Rule WH.R7: Stormwater from new and New Select stance Part 1 Schedule 1	
redeveloped impervious surfaces of existing	
urbanised areas – controlled activity.	
	onary activity rule or add a new matter of discretion
airport – restricted discretionary activity. have adverse "adverse effects on the	e environment".
effects beyond	
aquatic ecosystem	
health and	
mahinga kai, and	
include use and	
enjoyment of the	
CMA by	
surfers/swimmers.	
Discretionary and in the state of the state	
activity status will	
all matters,	
including	
unforseen matters,	
to be considered.	
Rule WH.R9: Stormwater from a local New Oppose Part 1 Schedule 1 The rule does not Reclassify as a discretic	onary activity rule.
authority or state highway allow all effects to	
network—restricted discretionary activity. be considedered.	
Rule WH.R10: Stormwater from new state New Amend Part 1 Schedule 1 Clause c does not Delete clause c	
highways— discretionary activity.	
management	
hierarchy.	
Rule WH.R11: Stormwater from new and New Amend Part 1 Schedule 1 clause (b) does not Delete clause (b).	
redeveloped impervious surfaces – reflect the effects	
discretionary activity. management hierarchy.	

Rule WH.R12: All other stormwater discharges – non-complying activity. New Support Part 1 Schedule 1 Consistent with the Retain. RMA's purpose (in conjunction with	
leavitanteian mini	
further and	
consequential	
amendments amendments	
sought by Forest &	
Bird).	
Rule WH.R13: Stormwater from new New Support Part 1 Schedule 1 Provides greatest Retain.	
unplanned greenfield development – assurance that the	
prohibited activity. RMA's purpose will	
be met.	
8.3.3 Wastewater New Part 1 Schedule 1	
	· 1
Rule WH.R14: Wastewater network New Amend Part 1 Schedule 1 Discretionary Reclassify as a discretionary activities.	vity.
catchment discharges – restricted activity status	
discretionary activity. ensures any	
unforeseen	
matters can be	
considered	
Rule WH.R15: Existing wastewater New Support Part 1 Schedule 1 Consistent with the Retain.	
discharges from a treatment plant – RMA's purpose.	
discretionary activity.	
Rule WH.R16: All other discharges of New Support Part 1 Schedule 1 Consistent with the Retain.	
wastewater – non-complying activity. RMA's purpose.	
8.3.4 Land uses New Freshwater	
Rule WH.R17: Vegetation clearance on New Oppose Freshwater The removal of Include additional standards:	
	not undertaken within, or within 10 metre
	ody, ephemeral watercourse, or the coastal
	ody, epiterial watercourse, or the coastai
sediments to be marine area	
	ot exceed 200m2 per property in any consecutive
certain pest plants 12-month period	
may still be habitat	
for indigenous Delete clause (a)(ii). In the altern	native, should pest plants be referred to, create a
	e plants listed in the GWRC pest management
	or pest plant removal to not exceed a given area
	200m2 threshold applies at which point you move
	200112 tilleshold applies at which point you move
removed, which to WH.R18.	
could then	
threaten hill	
stability if no plan	
is in place for	
restoration of that	
hillside).	
Additional	
standards are	
required.	
Mitigation plans	
are insufficient on	
their own and	
therefore a	
minimum setback	
from water bodies,	

I		T -	<u> </u>	I	T
_	New	Oppose	Freshwater	The inability to	Reclassify Rule WH.R18 as a discretionary activity or, alternatively, a restricted
highest erosion risk land – controlled				refuse consent	discretionary activity and include "adverse effects on the environment" as a
activity.				may mean critical	matter of discretion.
				policy dirction	
				under the NPSFM	
				or NZCPS will not	
				be achieved, higher	
				activity status is	
				required.	
Rule WH.R19: Vegetation clearance –	New	Support	Freshwater	Consistent with the	Retain.
discretionary activity.				RMA's purpose (in	
discretionary detivity.				conjunction with	
				further and	
				ľ	
				consequential , .	
				amendments	
				sought by Forest &	
				Bird).	
•	New	Amend	Freshwater	The inability to	Reclassify as a discretionary activity.
controlled activity.				refuse consent	
				may mean critical	
				policy dirction	
				under the NPSFM	
				or NZCPS will not	
				be achieved, higher	
				activity status is	
				required.	
Rule WH.R21: Plantation forestry –	New	Support	Freshwater	Manages sediment	Potain
•	inew	Support	Fresiiwatei		Netalli
discretionary activity.	NI.	6	Free leaders	from activity	D. L. C.
Rule WH.R22: Plantation forestry on highest	New	Support	Freshwater	Consistent with the	Retain.
erosion risk land – prohibited activity.				purpose of the	
				RMA.	
	New		Both		
Rule WH.R23: Earthworks – permitted	New	Oppose	Freshwater	A 5 metre setback	(d) the earthworks shall not occur within, or within a 10 5 m setback from, of a
activity.				is not sufficient to	surface water body, ephemeral watercourse, or the coastal marine area, except
				protect ecosystems	for earthworks undertaken in association with Rules R122, R124, R130, R131,
				and maintain	R134, R135, and R137, and
				water quality.	(e) soil or debris from earthworks is not placed where it can enter a surface
				Ephemeral	water body, ephemeral watercourse , or the coastal marine area, including via a
				watercourses	stormwater network, and
				should also be	(f) the area of earthworks must be stabilised within six months after completion
					1.1
				referred as they	of the earthworks, and
				have ecological	(g) there is no discharge of sediment from earthworks and/or flocculant into a
				value and, when	surface water body, ephemeral watercourse , the coastal marine area, or onto
				protected, can	land that may enter a surface water body, ephemeral watercourse or the coastal
				reduce	marine area, including via a stormwater network, and
				contaminant loads.	(h) erosion and sediment control measures shall be used to prevent a discharge of
					sediment where a preferential flow path connects with a surface water body,
		I	i	I	
					lephemeral watercourse, or the coastal marine area. including via a stormwater
					ephemeral watercourse, or the coastal marine area, including via a stormwater network.

In	I	Τ_	I	I_, ,, ,	In the second of
Rule WH.R24: Earthworks – restricted	New	Oppose			Reclassify as a discretionary activity rule.
discretionary activity.				of discretion are	
				not wide enough to	
				ensure all adverse	
				effects on all	
				important	
				ecological values	
				are addressed.	
Dula WILL DOE: Forthweeter was complying	New	Curanant	Dowt 1 Cabadula 1		Doto:
Rule WH.R25: Earthworks – non-complying	Inew	Support	Part 1 Schedule 1	Consistent with the	Retain.
activity.				RMA's purpose (in	
				conjunction with	
				further and	
				consequential	
				amendments	
				sought by Forest &	
				Bird).	
8.3.6 Nutrients and sediment from	New		Freshwater	Diray.	
pastoral farming	I VCVV		i restiwater		
	Now	Amond	Frachustar	It is critical that	Amond to include "(a2) annual mitrogen fertilizar uses the annual stacking mate
Rule WH.R26: Farming activities on a	New	Amend	Freshwater	It is critical that	Amend to include "(e2) annual nitrogen fertiliser use, the annual stocking rate,
property of between 4 hectares and 20					and the winter stocking rate is provided to Wellington Regional Council
hectares – permitted activity.				1 *	annually"
				land use pressures	
				to ensure they can	Retain balance of rule.
				appropriately	
				manage inputs and	
				set limits on	
				resource use, as	
				well as assess	
				effectiveness of the	
				plan. This means	
				information needs	
				to be provided by	
				landowners.	
Rule WH.R27: Farming activities on 20	New	Amend	Freshwater	Critical information	Amend rule to require the reporting of N fertiliser and stocking rate regularly (this
hectares or more of land – permitted				on farm inputs	is what has been done in PC1 Waikato). Amend the rule to include additional
					conditions that will ensure dirnking water etc is protected, or amend Schedule 36
activity.					_ ·
				l '	to ensure those things are covered (see relief sought for schedule 36).
				to ensure council	
				has information on	
				pressures in the	
				catchment	
Table 8.6: Phase-in of farm environment	New	Support	Freshwater	Ensures NPSFM	Retain
plans for part Freshwater Management		''		outcomes can be	
Units.				met and there is	
J				limited delay in	
				· ·	
			 - .	implementation	
Rule WH.R28: Livestock access to a small	New	Support	Freshwater	Ensures NPSFM	Retain
river – permitted activity.				outcomes can be	
				met, including	
				limiting sediment	
				and e coli pollution	
			I		

Rule WH.R32: Disenton access to a small river – discretionary activity. Resilvation Resilvatio					ı	T
Rule WH.R32: The use of land for farming activities — discretionary activity. Rule WH.R32: Change of rural land use — New Oppose Preshwater A change of land as cools and to microses in contominants, contrary to the plan policies. This could potentially which is over-to-to-to-my activity. Rule WH.R32: Farming activities — non-complying activities — non-complying activities — non-complying activities — non-complying activity. Rule WH.R32: Farming activities — non-complying activities — non-complying activities — non-complying activities — non-complying activity. Rule WH.R32: Farming activities — non-complying activities — non-complying activity. Rule WH.R32: Farming activities — non-complying activities — non-complying activity. Rule WH.R32: Farming activities — non-complying activities — non-complying activity. Delete the exceptions to take below not active and active activity. Delete the exceptions to take below not active and activities on all information and activities on all activities activities		New	Support	Freshwater		Retain
Rule WH.R31: The use of land for farming activities — discretionary activity. Rule WH.R31: Change of rural land use— discretionary activity. Rule WH.R31: Change of rural land use— discretionary activity. Rule WH.R32: Farming activities — non- complying activity. Rule WH.R32: Farming activities — non- complying activity. Reclassify as a non-complying scivity, which is over- activities — non- complying activity. Reclassify as a discretionary activity, Delete the exceptions to take below more activities — non- configuration on- configuration on- configuration on- met Rule WH.R33: Take and use of water in the What tust is Whanganui- Tara — restricted discretionary activity. Depose Freshwater Reclassify as a discretionary activity, Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity, Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity, Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity, Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity, Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity, Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity, Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretion or activity activ	river – discretionary activity.				outcomes can be	
Rule WH.R31: The use of land for farming activities — discretionary activity. Rule WH.R31: Change of rural land use— discretionary activity. Rule WH.R31: Change of rural land use— discretionary activity. Rule WH.R32: Farming activities—non- complying activity. Rule WH.R32: Farming activities—non- complying activity. Rule WH.R33: Take and use of water in the Whaltau ta Whanaganul- lara — restricted discretionary activity. Oppose Freshwater Rule WH.R33: Take and use of water in the Whaltau ta Whanaganul- lara — restricted discretionary activity. Oppose Freshwater Rule WH.R33: Take and use of water in the Whaltau ta Whanaganul- lara — restricted discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a) delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a) delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a) delete (b) and delete (d). Reclassify as a discretion or activity in the flow activity in the flow activity in the flo					met, including	
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discretionary activity.	activities – discretionary activity.				NPSFM and RMA	
discretionary activity.						
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Rule WH.R32: Farming activities – non- complying activity. Rule WH.R32: Farming activities – non- complying activity. Rule WH.R33: Farming activities – non- complying activity. Rule WH.R33: Farming activities – non- complying activity. Rectain outcomes on be met Rule WH.R33: Take and use of water Rule WH.R33: Take and use of water in the Whaltua Te Whanganui-a Tara – restricted discretionary activity. Rectainsify as a discretionary activity. Delete the exceptions to take below not wide enough to ensure all adverse effects on oil important ecological and geomorphological values are addressed, i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. They are also inconsistent with direction in with NFSFM 2020 to phase out	discretionary activity.				use could lead to	
contaminants, contamy to the plan policies. This could potentially lead to a decline in water quality, which is over a decline in water quality with the complying activity. Rule WH.R32: Farming activities – non-complying activity. S.3.7 Take and use of water in the Wew Service of the complete of the c						
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Rule WH.R32: Farming activities – non- complying activity. Rev 8.3.7 Take and use of water Rule WH.R33: Take and use of water Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara – restricted discretionary activity. Dispose Freshwater Preshwater Preshwater Freshwater Freshwater Preshwater All and the work of discretion are not wide enough to ensure all adverse effects on all important ecological and geomorphological values are addressed, i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. They are also inconsistent with direction in the NPSPM 2020 to phase-out					water quality,	
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Rule WH.R33: Take and use of water in the Whatitua Tera – restricted discretionary activity. Rough WH.R33: Take and use of water in the Whatitua Tera – restricted discretionary activity. Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d). Reclassify as a discretionary activity. Delete the exceptions to take below minimum flow in (a), delete (b) and delete (d).	complying activity.				outcomes can be	
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Whaitua Te Whanganui-a Tara – restricted discretionary activity. In the wide enough to ensure all adverse effects on all important ecological and geomorphological values are addressed, i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out	Rule WH.R33: Take and use of water in the	New	Oppose	Freshwater	of discretion are	Reclassify as a discretionary activity. Delete the exceptions to take below
discretionary activity. ensure all adverse effects on all important ecological and geomorphological values are addressed, i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out	Whaitua Te Whanganui-a Tara – restricted				*	
effects on all important ecological and geomorphological values are addressed, i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out					inde mad emelagin te	
important ecological and geomorphological values are addressed, i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out	discretionary detivity.					
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geomorphological values are addressed, i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out						
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values are addressed, i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out					geomorphological	
addressed, i.e. indigenous fish migration and emulating natural flow regimes to allow flushing of weeds and sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out					values are	
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sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out					allow flushing of	
sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out			I	I	weeds and	
are also inconsistent with direction in the NPSFM 2020 to phase-out						
inconsistent with direction in the NPSFM 2020 to phase-out						
direction in the NPSFM 2020 to phase-out					sediments. They	
NPSFM 2020 to phase-out					sediments. They are also	
phase-out					sediments. They are also inconsistent with	
					sediments. They are also inconsistent with direction in the	
					sediments. They are also inconsistent with direction in the NPSFM 2020 to	
overallocation.					sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out	
The rule					sediments. They are also inconsistent with direction in the NPSFM 2020 to	
					sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out overallocation.	
					sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out overallocation.	
					sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out overallocation. The rule framework for	
					sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out overallocation. The rule framework for flows and	
					sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out overallocation. The rule framework for flows and allocation must be	
further over-					sediments. They are also inconsistent with direction in the NPSFM 2020 to phase-out overallocation. The rule framework for flows and allocation must be amended to ensure	

Rule WH.R34: Take and use of water in the	Amended	Oppose	Freshwater	This rule (and	Delete Rule WH.R34 so that any takes below minimum flow or in exceedance of
Whaitua Te Whanganui-a-Tara –				framework) does	an allocation limit defaults to prohibited status.
discretionary activity.				not give effect to	
				the NPSFM and	
				does not ensure	
				the life-supporting	
				capacity	
				requirements of	
				indigenous species	
				will be met.	
	Amended	Support	Freshwater	Support in part	Retain
outstanding rivers or lakes – non-complying				provided flows and	
activity.				allocation limits	
				are developed to	
				ensure values of	
				outstanding water	
				bodies are	
				protected	
Rule WH.R36: Take and use of water	Amended	Support	Freshwater	III-defined takes	Amend as follows:
exceeding minimum flows or core				below minimum	The take and use of water from a river (including tributaries) or groundwater in Te
allocation – prohibited activity.				flow and in	Whanganui-a-Tara in Tables 8.8 and 8.9, that does not meet (a) or (b) of Rule-
				exceedance of an	WH.R33 that is not provided for in Rules WH.33, R155, R156, R159, R160, or
				allocation limit do	P.R30 is a prohibited activity.
				not achieve	
				direction in the	
				NPSFM, GW RPS,	
				do not safeguard	
				the life-supporting	
				capacity	
				requirements for	
				indigenous species	
				and must be	
				prohibited.	

	able 8.7: Minimum flows for rivers in the	Amended	Oppose	Freshwater	The NRP states	Include limits to ensure aquatic ecosystem values are safeguarded.
W	/haitua Te Whanganui-a-Tara.		''		over-allocation will	
					be considered	
					through the	
					Whaitua	
					Implementation	
					Programme. This	
					plan change is the	
					result of that yet it	
					does not amend	
					the policy direction	
					here. The flow and	
					allocation limits for	
					Whaitua Te	
					Whanganui-a-Tara	
					cannot be said to	
					give effect to the	
					NPSFM 2020 or	
					achieve the	
					purpose of the Act.	
					Interim Interim	
					limits need to be	
					set to ensure life	
					supporting	
					capacity	
					requirements for	
					indigenous species	
					are safeguarded.	
Ti	able 8.8: Surface water allocation amounts	Amended	Oppose	Freshwater	As above	Include limits to ensure aquatic ecosystem values are safeguarded.
	or rivers and Category A groundwater and					
	ategory B groundwater in the Te Awa					
	airangi/Hutt River, Wainuiomata River and					
	rongorongo River catchments.					
0.						
T;	able 8.9: Groundwater allocation amounts	Amended	Select stance	Freshwater		
	or Category B groundwater and Category C					
	roundwater in the Whaitua Te Whanganui-					
_	-Tara.					
	gure 8.1: Te Awa Kairangi / Hutt River and	Amended	Select stance	Freshwater		
	pper Hutt groundwater in Tables 8.8 and					
8.						
	gure 8.2: Te Awa Kairangi / Hutt River and	Amended	Select stance	Freshwater		
	ower Hutt groundwater in Tables 8.8 and					
8.	-					
		New		Both		
Porirua Whaitua						

Objective P.O1: The health of Te Awarua-o-	New	Amend	Part 1 Schedule 1	The explanation of	Include reference to ephemeral watercourses.
Porirua's groundwater, rivers, lakes, natural				the wai ora state is	·
wetlands, estuaries, harbours and coastal				treated as a note	Delete the word "note".
marine area is progressively improved and				and should form	
is wai ora by 2100.				part of the	Amend the target timeframe to be 2050 (rather than 2100), or to provide part-
, '				ľ	FMU / catchment specific timeframes that account for the relative ease/difficulty
				1 -	of achieving targets in different catchments.
				"explanatory	
				notes" or	Amend "Rivers flow naturally, with ripples natural riffle, run, and pool habitat
				"guidance notes")	and the river beds are stony"
				can be argued to	
				have no legal	
				force. It is	
				important that the	
				definition of "wai	
				ora state" has legal	
				effect and is not	
				undermined.	
				Ephemeral	
				watercourses hold	
				ecological values	
				and should be	
				referred to in the	
				chapeau alongside	
				groundwater etc.	
				2100 is too far	
				away as a target	
				for achieving wai	
Objective P.O2: Te Awarua-o-Porirua's	New	Amend	Freshwater	Requires	The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, ephemeral
groundwater, rivers, lakes and natural				amendment to	watercourses, and natural wetlands and their margins are on a trajectory of
wetlands, and their margins are on a				give effect to	measurable improvement towards wai ora, such that by 2030 2040
trajectory of measurable improvement				NPSFM and RMA	
towards wai ora.					Include reference to natural form and character in the objective (under (a)) and
					refer to ecosystem health as it is more consistent with NPSFM. i.e., "(a) water
					quality, habitats, natural form and character are at a level where the state of
					aquatic life ecosystem health is meaningfully improved"
Objective P.O3: The health and wellbeing of	New	Amend	Part 1 Schedule 1	Achieves key policy	Retain but amend to set timeframe at 2030.
coastal water quality, ecosystems and				direction in higher	
habitats in Pāuatahanui Inlet, Onepoto Arm				order documents,	
and the open coastal areas of Te Awarua-o-				and ultimately, the	
Porirua is maintained or improved to				purpose of the	
achieve the coastal water objectives set out				RMA. However	
in Table 9.1.				shorter timeframe	
		I		should be set.	1

Table 9.1: Coastal water objectives.	New	Oppose	Part 1 Schedule 1	r '	Include a parameter for Turbidity (Unit: NTU; Statistic: Turbidity must be maintained at or below the current annual median or at or below pre-existing levels, whichever is lesser; Onepoto Arm: <10.8, Pauatahanui Inlet: <6.9; Open Coast: No discernible change). Add further parameters (for lead, dissolved oxygen, temperature, pH, secchi depth, chlorophyll-a, total phosphorous, total nitrogen, nitrite-nitrate nitrogen, ammoniacal nitrogen, and faecal coliforms) to ensure narrative objectives in Table 3.8 of the Operative Plan are met. Amend Open Coast unit for Enterococci: <200 <40 Amend timeframe to 2030 or provide interim targets as per NPSFM 3.11 requirement (with this being a critical receiving environment).
Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	New	Amend	Part 1 Schedule 1	NPSFM refers to "threatened species" (Appendix 1A) rather than "threatened freshwater species" ("freshwater species" generally are refered to in Policy 9). Some threatened species that rely on freshwater for part of their lifecycle may not constitute a "freshwater species". Amendment also needed to definition. Providing a standalone objective for habitat ensures implementation of NPSFM policy 7 and 9, and	The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status. Retain balance of policy to provide direction for protection and monitoring of habitat.
Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	New	Support	Freshwater	Gives effect to the NPSFM 2020	Retain as proposed
	New	Amend	Freshwater	Greater provision for natural form and character required to give effect to NPSFM and RMA	Amend "water quality, habitats, natural form and character, and"

	1		I	I	T
Table 9.2: Target attribute states for rivers.	New	Amend	Freshwater	is too high. More	State river type and class for each of the part FMUs Set a minimum target state for periphyton biomass for all part FMUs at NPSFM band of 120 mg chl-a (and retain higher targets where included). Amend nitrate toxicity target to be NPSFM 'A' band for all part FMUs. Retain DIN target states where they are set below 0.3 mg/L. Amend others to be 0.3 mg/L (median) for good rivers (type 1 and 4) 0.6 for medium rivers (type 2 and 3) and 1.0 for poor rivers (type 5 & 6). Minimum DIN target should be no higher than 1.0. Clearly define what fish community health as determined by experts actually means Set higher targets for MCI attributes Retain 'nuisance macrophytes', 'periphyton cover', mahinga kai, and toxicants attributes from table 3.4 Retain groundwater attributes from table 3.6 Amend table (or add another table) to include target attribute states for habitat and natural form and character using the Habitat Quality / Natural Character Index. Minimum targets should set out a target of maintenance of habitat quality / natural character (e.g., minimum ratio of current:reference condition of 1.00). Amend target timeframe to 2030 and outline date from which maintenance will be continued (as per NPSFM 3.11). If date remains 2040, set out interim states at no longer than 10-year intervals. Set higher targets for e. coli.
9.2 Policies	New		Both		
9.2.1 Ecosystem healtha and water quality			Both		
Policy P.P1: Improvement of aquatic ecosystem health.	New	Amend	Part 1 Schedule 1	Explicit provision for natural form and character should be included. The policy should also include direction that "enhancement" of Ifows should be through limits and natural means, not 'stream augmentation' or managed aquifer recharge.	Amend (b) to read "restoring habitats and natural form and character" Amend (c) to include "by setting limitis and reducing allocation volumes in overallocated catchments, and by restoring natural form and character to promote natural aquifer recharge" Retain balance of policy.

Policy P.P2: Management of activities to New Amend Part 1 Schedule 1 The direction to Amend (a) as follows:	
achieve target attribute states and coastal prohibit unplanned "prohibiting unplanned"	ed greenfield development and for other greenfield
water objectives. greenfield developments minimi	ising the contaminants so that adverse effects are avoided
development is and requiring financia	al contributions as to offset adverse effects from residual
supported but the stormwater contamin	nants"
remaining policy	
	that it refers to ephemeral watercourses, wetlands and
opposed. This estuaries.	that it refers to epiterneral watercourses, wetlands and
policy effectively	
	use intensification that individually or cumulatively may lead
compensatory to a decline in water of	quality is prohibited"
measures, by	
means of financial	
contributions, for	
stormwater	
contamination - an	
approach that is	
contrary to RMA	
s107, the NZCPS,	
and the effects	
management	
hierarchy under	
the NSPFM.	
Financial	
contributions per	
se are not an	
"offset".	
Livestock should be	
Policy P.P3: Freshwater Action Plans role in New Support Freshwater Ensures NPSFM Retain	
the health and wellbeing of waterways. direction is met.	
	If date remains 2040, set out interim states at no longer than
shorter timeframe 10-year intervals.	in date remains 20 to, see out intermit states at no longer than
is required	
	If data was a 2040 and and interior states at an Indianathan
	If date remains 2040, set out interim states at no longer than
contaminant load reductions. shorter timeframe 10-year intervals.	
is required	
Table 9.4: Part Freshwater Management New Amend Part 1 Schedule 1 Timeframe is Include a timeframe	
Unit sediment load reductions required to required	
achieve the visual clarity target attribute	
state.	
8.2.1 Discharges to water New Both	
Policy P.P5: Localised adverse effects of New Amend Part 1 Schedule 1 Policy P.P5 is Policy P.P5: Localised	Ladverse effects of point source discharges
	e effects of point source discharges to freshwater and coastal
	ne of reasonable mixing are avoided or minimised, including
from RMA s70 by avoiding:	3
which is not	
expressly limited to	
point source	
discharges. Policy	
P.P5 must be	
broadened to	
capture all	
capture un	

Policy P.PS. Point source discharges. New Support Preshwater Ministry of the present of the pre	Policy P product 9.2.2 St Policy P achieve coastal Policy P stormw Policy P stormw rade pi	P.P7 Discharges to groundwater. P.P8 Avoiding discharges of specific acts and waste. Stormwater P.P9: General stormwater policy to we the target attribute states and	New New	Support	Freshwater Part 1 Schedule 1	NPSFM by improving discharge management Helps give effect to NPSFM The discharges referred to must be broadened to include anything at	Retain and support policy with an objective with target attribute states for groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for groundwater to protect human and ecosystem health. Add "(e) rubbish (f) agrichemicals, fertilisers, persistent chemicals
Policy P-P7 Discharges to groundwater. Policy P-P7 Discharges of specific products and waste. Part 1 Schedule 1 Part 1 Schedule 1 Part 1 Schedule 1 Part 1 Schedule 2 Part 1 Schedule 3 Part 1 Schedule 4 Part 1 Schedule 3 Part 1 Schedule 4 Part 1 Schedule 3 Part 1 Schedule 4 Part 1 Schedule 4 Part 1 Schedule 4 Part 1 Schedule 4 Part 1 Schedule 5 Part 1 Schedule 6 Part 1 Schedule 6 Part 1 Schedule 7 Part 1 Schedule 8 Part 1 Schedule 8 Part 1 Schedule 8 Part 1 Schedule 9 Part 1	Policy P product 9.2.2 St Policy P achieve coastal Policy P stormw Policy P stormw trade pr	P.P8 Avoiding discharges of specific acts and waste. Stormwater P.P9: General stormwater policy to we the target attribute states and	New	Amend	Freshwater Part 1 Schedule 1	improving discharge management Helps give effect to NPSFM The discharges referred to must be broadened to include anything at	groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for groundwater to protect human and ecosystem health. Add "(e) rubbish (f) agrichemicals, fertilisers, persistent chemicals
Policy P.P7 Discharges to groundwater. Policy P.P8 Avoiding discharges of specific products and woste. Part 1 Schedule 1 Part 1 Schedule 2 Part 1 Schedule 3 Part 2 Schedule 3 Part 3 Schedule 3 Part 3 Schedule 4 Part 1 Schedule 5 Part 3 Schedule 5 Part 4 Schedule 5 Part 5 Schedule 7 Part 5 Schedule 7 Part 5 Schedule 7 Part 6 Schedule 7 Part 1 Schedule 7 Part 6 Schedule 7 Part 1 Schedule 7 Part 1 Schedule 7 Part 1 Schedule 7 Part 1 Schedule 7 Part 4 Schedule 7 Part 4 Schedule 7 Part 5 Schedule 7 Part 5 Schedule 7 Part 6 Schedule 7 Part 6 Schedule 7 Part 7 Schedule 7 Part 8 Schedule 7 Part 8 Schedule 7 Part 8 Schedule 7 Part 9 Schedule	Policy P product 9.2.2 St Policy P achieve coastal Policy P stormw Policy P stormw trade pr	P.P8 Avoiding discharges of specific acts and waste. Stormwater P.P9: General stormwater policy to we the target attribute states and	New	Amend	Freshwater Part 1 Schedule 1	discharge management Helps give effect to NPSFM The discharges referred to must be broadened to include anything at	groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for groundwater to protect human and ecosystem health. Add "(e) rubbish (f) agrichemicals, fertilisers, persistent chemicals
Policy P-F7 Discharges to groundwater. Policy P-F7 Discharges to groundwater. Policy P-F8 Avaiding discharges of specific products and waste. Part 1. Schedular 1 Part 1. Schedular 2 Part 1. Schedular 3 Part 1. Sch	Policy P product 9.2.2 St Policy P achieve coastal Policy P stormw Policy P stormw trade pr	P.P8 Avoiding discharges of specific acts and waste. Stormwater P.P9: General stormwater policy to we the target attribute states and	New	Amend	Freshwater Part 1 Schedule 1	management Helps give effect to NPSFM The discharges referred to must be broadened to include anything at	groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for groundwater to protect human and ecosystem health. Add "(e) rubbish (f) agrichemicals, fertilisers, persistent chemicals
Policy P.P.D. Scharges to groundwater. Policy P.P.B. Avoiding discharges of specific products and waste. Part 1. Schedule 1. The discharges of specific products and waste. Part 1. Schedule 2. The discharges referred to must be producted on the product of the	Policy P product 9.2.2 St Policy P achieve coastal Policy P stormw Policy P stormw trade pr	P.P8 Avoiding discharges of specific acts and waste. Stormwater P.P9: General stormwater policy to we the target attribute states and	New	Amend	Part 1 Schedule 1	Helps give effect to NPSFM The discharges referred to must be broadened to include anything at	groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for groundwater to protect human and ecosystem health. Add "(e) rubbish (f) agrichemicals, fertilisers, persistent chemicals
Policy P.P.B. Avoiding ducharges of specific products and waste. Amend Part 1 Schedule 1 Part 1 Schedule 1 Part 1 Schedule 1 Part 3 Schedule 2 Part 3 Schedule 2 Part 3 Schedule 1 Part 4 Schedule 1 Part 3 Schedule 1 Part 3 Schedule 1 Part 3 Schedule 1 Part 3 Schedule 2 Part 3 Schedule 2 Part 3 Schedule 3 Part 3 Schedule 3 Part 4 Schedule 1 Part 3 Schedule 3 Part 4 Schedule 1 Part 3 Schedule 3 Part 4 Schedule 1 Part 3 Schedule 3 Part 4 Schedule 3 Part 3 Schedule 3 Part 4 Schedule 3 Part 3 Schedule 3 Part 4 Schedule 3 Part 4 Schedule 3 Part 4 Schedule 3 Part 4 Schedule 3 Part 5 Schedule 3 Part 5 Schedule 3 Part 5 Schedule 3 Part 6 Schedule 3 Part 6 Schedule 3 Part 7 Schedule 3 Part 8 Sched	Policy P product 9.2.2 St Policy P achieve coastal Policy P stormw Policy P stormw trade pr	P.P8 Avoiding discharges of specific acts and waste. Stormwater P.P9: General stormwater policy to we the target attribute states and	New	Amend	Part 1 Schedule 1	NPSFM The discharges referred to must be broadened to include anything at	groundwater quality, including a target of < 1.0 mg/L nitrate-nitrogen for groundwater to protect human and ecosystem health. Add "(e) rubbish (f) agrichemicals, fertilisers, persistent chemicals
Policy P.P.B. Amend waste. Part 1 Schedule 1 Part 1 Schedule 2 Part 1 Schedule 3 Part 1 Schedule 4 Part 1 Schedule 4 Part 1 Schedule 5 Part 1 Schedule 6 Part 1 Schedule 6 Part 1 Schedule 7 Part 1 Schedule 7 Part 1 Schedule 8 Part 1 Schedule 8 Part 1 Schedule 8 Part 1 Schedule 9 Part 1 Schedule 8 Part 1 Schedule 9 Part 1 Schedule 9 Part 1 Schedule 9 Part 1 Schedule 1 Part 1 Schedule 2 Part 1 Schedule 3 Part 1 Schedule 4 Part 1 Schedule 4 Part 1 Schedule 4 Part 1 Schedule 5 Part 1 Schedule 6 Part 1 Schedule 6 Part 1 Schedule 7 Part 1 Schedule 8 Part 1 Schedule 8 Part 1 Schedule 9 Pa	Policy P stormw Policy P stormw Policy P stormw	Stormwater P.P9: General stormwater policy to we the target attribute states and	New			The discharges referred to must be broadened to include anything at	groundwater to protect human and ecosystem health. Add "(e) rubbish (f) agrichemicals, fertilisers, persistent chemicals
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enables cost considerations to be factored into decision-makers, which are too often relied upon to side-step taking more enables cost considerations to lnsert explicit direction refering to and requiring water sensitive design for new and redeveloped areas.	new and	and redeveloped impervious surfaces.					
considerations to be factored into decision-makers, which are too often relied upon to side-step taking more						*	urban areas reduced to the extent possible_ practicable,
be factored into decision-makers, which are too often relied upon to side-step taking more							
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which are too often relied upon to side-step taking more							and redeveloped areas.
often relied upon to side-step taking more						· ·	
to side-step taking more							
more						·	
						to side-step taking	
environmentally						environmentally	
responsible						responsible	
approaches.						approaches.	
Reference to						Reference to	
"where nossible" is						"where possible" is	
where possible is						required.	

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•	New	Amend	Part 1 Schedule 1	Higher order	Amend to require adverse effects of residual stormwater contaminants to be
offsetting for new greenfield development.				direction (including	"avoided, remedied, or mitigated".
				both the NZCPS	
				and NPSFM) do not	
				provide for	
				offsetting and	
				compensation as	
				expressed in Policy	
				WH.P15. Further,	
				financial	
				contributions are	
				compensation and	
				1	
Dalieu D. D. I. Ctarmustar discharges from	Now	Cupport	Part 1 Schedule 1	not an offset.	Datain
,	New	Support	Part 1 Scriedule 1	The policy direction	Retain.
new unplanned greenfield development.				reflects the NZCPS and NPSFM 2020	
				ana NPSFIVI 2020	
9.2.3 Wastewater	New		Both		
	New	Support	Part 1 Schedule 1	The policy direction	Retain
achieve target attribute states and coastal	l'iew	Зарроге	l are 1 seriedale 1	reflects the NZCPS	The Court of the C
water objectives.				and NPSFM 2020	
water objectives.				UNU 1VI 31 IVI 2020	
Policy P.P17: Progressing works to meet	New	Amend	Freshwater	Amendment	State "where possible" rather than "where practicable"
Escherichia coli target attribute states.				needed to	
Ğ				maintain and	
				improve water	
				quality	
Policy P.P18: Managing wastewater	New	Amend	Part 1 Schedule 1	Stronger policy is	Amend (c) to read "eliminate dry weather discharges by progressively reducing
network catchment discharges.				needed to give	the frequency and/or volume of dry weather discharges or the"
				effect to NPSFM	
Policy P.P19: Managing existing wastewater	New	Amend	Part 1 Schedule 1	**	Amend to include explicit point about reducing e coli loads where target states
treatment plant discharges.				1 ' ' '	are currently not met.
				on maintaining or	,
				improving	
				discharge quality	
				where targets are	
				already met.	
9.2.4 Rural Land Uses and Earthworks	New		Both	an eddy met.	
	New	Amend	Freshwater	Ephemeral	"(4) excluding stock from water bodies, ephemeral watercourses, and the coastal
of nutrients and Escherichia coli from				watercourses and	marine area as a limit on land use,"
farming activities.				estuaries should	
				also be referred in	Retain balance of policy.
				clause (d) as these	11/
				can support high	
				ecological values	
		L	I.	Jesorogicai values	

		Ι	I	I	
	New	Amend	Freshwater	The policy only	Amend to provide council scope to require reductions in discharges from smaller
reducing diffuse discharges of nitrogen				directs reduction of	
from farming activities.				discharges on large	
				properties and	See relief sought for definition of "recognised nitrogen risk assessment tool".
				horticultural	
				properties. This	
				risks not capturing	
				discharges that	
				cumulatively are	
				significant. Also,	
				the efficacy of this	
				policy is contingent	
				on an adequate	
				nitrogen risk	
				assessment tool	
				which, per its	
				definition, is	
				proposed to be	
				(unlawfully)	
				delegated to	
				Council to approve.	
				Apart from these	
				aspects, Forest &	
				1	
				Bird is generally	
				supportive of the	
				remaining policy	
				direction.	
Policy P.P22: Achieving reductions in	New	Support	Freshwater	Provides a	Retain
sediment discharges from farming activities	New	Support	Freshwater	Provides a mechanism to	Retain
	New	Support	Freshwater		Retain
sediment discharges from farming activities	New	Support	Freshwater	mechanism to	Retain
sediment discharges from farming activities	New	Support	Freshwater	mechanism to reduce sediment loads and	Retain
sediment discharges from farming activities	New	Support	Freshwater	mechanism to reduce sediment loads and therefore protect	
sediment discharges from farming activities	New	Support	Freshwater	mechanism to reduce sediment loads and therefore protect rivers and receiving	
sediment discharges from farming activities	New	Support	Freshwater	mechanism to reduce sediment loads and therefore protect rivers and receiving environments from	
sediment discharges from farming activities	New	Support	Freshwater	mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects	
sediment discharges from farming activities	New	Support	Freshwater	mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which	
sediment discharges from farming activities	New	Support	Freshwater	mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly	
sediment discharges from farming activities	New	Support	Freshwater	mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat	
sediment discharges from farming activities	New	Support	Freshwater	mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te	
sediment discharges from farming activities	New	Support	Freshwater	mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat	
sediment discharges from farming activities on land with high risk of erosion.				mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua	
sediment discharges from farming activities on land with high risk of erosion. Policy P.P23: Phasing of farm environment		Amend	Freshwater	mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua	Amend to include deposited sediment - "prioritises those
sediment discharges from farming activities on land with high risk of erosion.				mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended
sediment discharges from farming activities on land with high risk of erosion. Policy P.P23: Phasing of farm environment				mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua	Amend to include deposited sediment - "prioritises those
sediment discharges from farming activities on land with high risk of erosion. Policy P.P23: Phasing of farm environment				mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua Deposited sediment is also a	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended
sediment discharges from farming activities on land with high risk of erosion. Policy P.P23: Phasing of farm environment				mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua Deposited sediment is also a critical measure of	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended fine sediment or deposited fine sediment has a baseline state of D and/or where
sediment discharges from farming activities on land with high risk of erosion. Policy P.P23: Phasing of farm environment				mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua Deposited sediment is also a critical measure of sediment movement through	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended fine sediment or deposited fine sediment has a baseline state of D and/or where
sediment discharges from farming activities on land with high risk of erosion. Policy P.P23: Phasing of farm environment				mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua Deposited sediment is also a critical measure of sediment movement through thr catchment and	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended fine sediment or deposited fine sediment has a baseline state of D and/or where
sediment discharges from farming activities on land with high risk of erosion. Policy P.P23: Phasing of farm environment				mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua Deposited sediment is also a critical measure of sediment movement through thr catchment and of ecological	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended fine sediment or deposited fine sediment has a baseline state of D and/or where
sediment discharges from farming activities on land with high risk of erosion. Policy P.P23: Phasing of farm environment				mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua Deposited sediment is also a critical measure of sediment movement through thr catchment and of ecological consequences for	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended fine sediment or deposited fine sediment has a baseline state of D and/or where
Policy P.P23: Phasing of farm environment plans.	New	Amend	Freshwater	mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua Deposited sediment is also a critical measure of sediment movement through thr catchment and of ecological consequences for native species	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended fine sediment or deposited fine sediment has a baseline state of D and/or where dissolved inorganic nitrogen is shown as being in need of improvement"
Policy P.P23: Phasing of farm environment plans.	New			mechanism to reduce sediment loads and therefore protect rivers and receiving environments from the adverse effects of sediment, which is significantly degrading habitat and destroying Te Awarua-o-Porirua Deposited sediment is also a critical measure of sediment movement through thr catchment and of ecological consequences for	Amend to include deposited sediment - "prioritises those part Freshwater Management Units where Table 9.2 shows that suspended fine sediment or deposited fine sediment has a baseline state of D and/or where dissolved inorganic nitrogen is shown as being in need of improvement"

T- 1	I	I	1	I_, -	Tarana and an area and a second
Policy P.P25: Promoting stream shading.	New	Amend	Freshwater	The restoration of	Contribute to the achievement of aquatic ecosystem health by promoting
				stream shade can	requiring the progressive shading of streams where nutrient reductions alone will
				improve water	be insufficient to achieve periphyton target attribute states.
				quality and habitat	
				in streams -	
				beyond just	
				assisting with	
				meeting	
				_	
				periphyton targets.	
				More active and	
				positive direction	
				on stream shading	
				is also justified.	
Policy P.P26: Achieving reductions in	New	Amend	Freshwater	Further direction	Include direction that large setbacks are required in areas of plantation forestry
sediment discharges from plantation				required to ensure	and include a cap on the area logged in one harvest (or direct selective harvesting
forestry.				effects are	where not all trees are taken out). Retain (c) to assist in eventual retirement of
10.030 y.				minimised	highe
Doliny D D27, Management of continue to	Now	Amond	Down 1 Caba alula 4		
1 '	New	Amend	Part 1 Schedule 1	Setback distances	Add a new clause:
sites.				from waterways	(x) requiring setback distances, of no less than 10 metres, from surface water
				(of 10 metres or	bodies, ephemeral watercourses, and the coastal marine area.
				more) are an	
				effective method	
				of ensuring fine	
				seidment particles	
				from earthworks	
				are removed and	
				to prevent adverse	
				effects on	
				ecosystems.	
Policy P.P28: Discharge standard for	New	Amend	Part 1 Schedule 1	Controls on	Amend to include (e) "the discharge shall not, after the zone of reasonable
earthworks sites.				deposited	mixing, result in: (i) a change in deposited sediment cover of more than 20%, or
				sediment are also	(ii) an increase in deposited sediment to be more than 20% of the bed"
				required	
Policy P.P29: Winter shut down of	New	Amend	Part 1 Schedule 1	Reduces risk of	Retain
earthworks.				sediment	
car triworks.					
				degrading	
0.2.5.14.1	A 1 1/c :		F	ecosystems	
9.2.5 Water allocation	Amended/New		Freshwater		
Policy P.P30: Minimum flows and minimum	Amended	Support	Freshwater		
water levels in Te Awarua-o-Porirua					
Whaitua.			<u> </u>		
Policy P.P31: Water takes at minimum flows	New	Oppose	Freshwater	Policy P.P31 is	Delete the exceptions to Policy P.P31:
and minimum water levels.		Ι΄΄		contrary to the	The take and use of water from a river, Category A groundwater and Category B
				NPSFM - in	groundwater (stream depletion) shall not occur when flows or water levels fall
					1-
				particular, to avoid	below minimum flows or minimum water levels in Policy P.P30, with the
				overallocation.	exception that water is available below minimum flows or minimum water levels:
					a) for firefighting, an individual's reasonable domestic needs and the reasonalb
					eneeds of a person's animals for drinking water as provided for by section
					14(3)(b) and 14(3)(e) of the RMA, or
					b) as authorised by any existing resource consent.
Policy P.P32: Allocation in the Te Awarua-o-	New	Support	Freshwater		
Porirua Whaitua.		135663.			
	New		Both		

9.3.1 Discharges of contaminants	New		Both		
Rule P.R1: Point source discharges of		Support		Ensures NPSFM	Retain as proposed
specific contaminants – prohibited activity.				direction and water quality	
				outcomes are met	
Rule P.R2: Stormwater to land – permitted activity.	New	Select stance	Freshwater	outcomes are met	
	New	Select stance	Part 1 Schedule 1		
individual property to surface water or					
coastal water – permitted activity.					
Rule P.R4: Stormwater from an existing high	New	Select stance	Part 1 Schedule 1		
risk industrial or trade premise – permitted					
activity.					
Rule P.R5: Stormwater from new and	New	Oppose	Part 1 Schedule 1	Rule P.R5 contains	Reclassify Rule P.R5 as a controlled activity and include alternative standards that
redeveloped impervious surfaces –				elements that need	are enforceable and distinguish between discharges that would not have
permitted activity.				to be subject to	significant adverse effects on aquatic life and those having such effects that then
				more Council	require consent under a higher activity classification. Explicitly require 'water
				oversight. Many	sensitive urban design' as a condition of consent (as per P.R6), including rainwater
			I	elements, such as	storage tanks at a property level (which are accessible to provide water for
				clause (h), are not	gardening and emergency water supply) and stormwater treatment via wetlands,
				sufficiently certain	swales, and rainwater gardens.
				and enforceable	
				for a permitted	
				activity, and leave	
				discretionary	
				assessment to the	
				plan user as to whether the	
				activity is	
				permitted or	
				requires consent.	
				Higher activity	
				status and the	
				addition of clearer	
				and enforceable	
				standards are	
				required to ensure	
				that both	
				compliance with s	
				70 RMA is achieved	
				and cumulative	

Dula D DC: Starmunatar frame C-11	Now	Onnoce	Down 1 Cabacilists 4	Controlled matinity	Dodosifi, Dulo D.DC os o dispretionem activity and delete devel
Rule P.R6: Stormwater from new greenfield	ivew	Oppose		Controlled activity	Reclassify Rule P.R6 as a discretionary activity and delete clause c.
impervious surfaces – controlled activity.				status is	
				inappropriate,	
				particularly as the	
				rule has effect in	
				the coastal	
				environment	
				where the NZCPS	
				applies. The	
				inability to refuse	
				consent may not	
				give effect to	
				NZCPS directions	
				and RMA s107(1).	
				1	
				Higher activity	
				status is required.	
				Clause c should be	
				deleted as it is	
				inconsistent with	
				the effects	
				management	
				hierarchy.	
	New	Amend	Part 1 Schedule 1	Council requires	Make Restricted Discretionary
redeveloped impervious surfaces of existing				more control to	
urbanised areas – controlled activity.				manage effects	
Rule P.R8: Stormwater from a local	New	Oppose	Part 1 Schedule 1	The rule does not	Reclassify as a discretionary activity rule.
authority or state highway				allow all effects to	
network-restricted discretionary activity.				be considedered.	
	New	Amend	Part 1 Schedule 1	Clause c does not	Delete clause c
highways- discretionary activity.				reflect the effects	
,				management	
				hierarchy.	
Rule P.R10: Stormwater from new and	New	Amend	Part 1 Schedule 1	clause (b) does not	Delete clause (b).
redeveloped impervious surfaces–				reflect the effects	
discretionary activity.				management	
and a delivery.				hierarchy.	
Rule P.R11: All other stormwater discharges	New	Support	Part 1 Schedule 1	Consistent with the	Retain
– non-complying activity.	1.10.00	σαρροιτ		RMA's purpose (in	
Hon complying activity.				conjunction with	
				further and	
				r	
				consequential	
				amendments	
				sought by Forest &	
				Bird).	
	New	Support	Part 1 Schedule 1	Provides greatest	Retain.
new unplanned greenfield development –				assurance that the	
prohibited activity.				RMA's purpose will	
				be met.	
9.3.3 Wastewater	New		Part 1 Schedule 1		

1	ı	ı	ı	T	
Rule P.R13: Wastewater network	New	Amend	Part 1 Schedule 1	Discretionary	Reclassify as a discretionary activity.
catchment discharges to water – restricted				activity status	
discretionary activity.				ensures any	
				unforeseen	
				matters can be	
				considered	
Rule P.R14: Existing wastewater discharges	New	Support	Part 1 Schedule 1	Consistent with the	Retain.
from a treatment plant to coastal and				RMA's purpose.	
freshwater – discretionary activity.					
Rule P.R15: All other discharges of	New	Support	Part 1 Schedule 1	Consistent with the	Retain.
wastewater – non-complying activity.		''		RMA's purpose.	
9.3.4 Land uses	New		Freshwater	, ,	
Rule P.R16: Vegetation clearance on highest		Oppose	Freshwater	The removal of	Include additional standards:
erosion risk land– permitted activity.				1	(x) the vegetation clearance is not undertaken within, or within 10 metre
eresien risk iana permittea activity.				still cause	setback from, a surface water body, ephemeral watercourse, or the coastal
					marine area
					(x) vegetation clearance does not exceed 200m2 per property in any consecutive
					12-month period
					12-month period
				may still be habitat	Delete eleves (a)(ii) In the eltermetive should neet plants be referred to specify
				r -	Delete clause (a)(ii). In the alternative, should pest plants be referred to, create a
					definition of pest plants as those plants listed in the GWRC pest management
				whole hillside of	plan. Introduce a requirement for pest plant removal to not exceed a given area
				I -	per year- i.e., make it clear the 200m2 threshold applies at which point you move
				· ·	to P.R17.
				could then	
				threaten hill	
				stability if no plan	
				is in place for	
				restoration of that	
				hillside).	
				Additional	
				standards are	
				required.	
				Mitigation plans	
				are insufficient on	
				their own and	
				therefore a	
				minimum setback	
				from water bodies,	
				coastal marine	
		_			
Rule P.R17: Vegetation clearance on highest	New	Oppose	Freshwater	1	Reclassify Rule P.R17 as a discretionary activity or, alternatively, a restricted
erosion risk land – controlled activity.				refuse consent	discretionary activity and include "adverse effects on the environment" as a
				may mean critical	matter of discretion.
				policy dirction	
				under the NPSFM	
				or NZCPS will not	
				be achieved, higher	
				activity status is	
				required.	

Dula D D10. Variation also vivi	l _{Na}	Ca.a.=±	Гиа a la ±	Complete at 11 11 11	Dotain
_	New	Support	Freshwater	Consistent with the	retain.
discretionary activity.				RMA's purpose (in	
				conjunction with further and	
				ľ	
				consequential	
				amendments	
				sought by Forest &	
Dula D D10. Diametria a famorita a controlla d	Name	A a al	Farabonatan	Bird).	De la crife de la discontinua de crife.
Rule P.R19: Plantation forestry – controlled	INEW	Amend	Freshwater	The inability to	Reclassify as a discretionary activity.
activity.				refuse consent	
				may mean critical	
				policy dirction	
				under the NPSFM	
				or NZCPS will not	
				be achieved, higher	
				activity status is	
				required.	
Rule P.R20: Plantation forestry –	New	Support	Freshwater	Ensures	Retain
discretionary activity.				maangement of	
				sediment issues	
Rule P.R21: Plantation Forestry on highest	New	Support	Freshwater	Ensures avoidance	Retain
erosion risk land – prohibited activity.				of sediment issues	
	New		Both		
Rule P.R22: Earthworks – permitted activity.	New	Oppose	Freshwater	A 5 metre setback	(d) the earthworks shall not occur within, or within a 10 5 m setback from, of a
				is not sufficient to	surface water body, ephemeral watercourse , or the coastal marine area, except
				, ,,	,, ,
					for earthworks undertaken in association with Rules R122, R124, R130, R131,
				protect ecosystems	
				protect ecosystems and maintain	for earthworks undertaken in association with Rules R122, R124, R130, R131,
				protect ecosystems and maintain	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and
				protect ecosystems and maintain water quality.	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface
				protect ecosystems and maintain water quality. Ephemeral	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a
				protect ecosystems and maintain water quality. Ephemeral watercourses	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and
				protect ecosystems and maintain water quality. Ephemeral watercourses should also be	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion
				protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and
				protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a
				protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto
				protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal
				protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of
				protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body,
				protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of
Rule P.R23: Earthworks – restricted	New	Oppose	Part 1 Schedule 1	protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network.
	New	Oppose	Part 1 Schedule 1	protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce contaminant loads. The listed matters	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater
Rule P.R23: Earthworks – restricted discretionary activity.	New	Oppose	Part 1 Schedule 1	protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce contaminant loads. The listed matters of discretion are	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network.
	New	Oppose	Part 1 Schedule 1	protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce contaminant loads. The listed matters of discretion are not wide enough to	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network.
	New	Oppose	Part 1 Schedule 1	protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce contaminant loads. The listed matters of discretion are not wide enough to ensure all adverse	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network.
	New	Oppose	Part 1 Schedule 1	protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce contaminant loads. The listed matters of discretion are not wide enough to ensure all adverse effects on all	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network.
	New	Oppose	Part 1 Schedule 1	protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce contaminant loads. The listed matters of discretion are not wide enough to ensure all adverse effects on all important	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network.
	New	Oppose	Part 1 Schedule 1	protect ecosystems and maintain water quality. Ephemeral watercourses should also be referred as they have ecological value and, when protected, can reduce contaminant loads. The listed matters of discretion are not wide enough to ensure all adverse effects on all	for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and (e) soil or debris from earthworks is not placed where it can enter a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network, and (f) the area of earthworks must be stabilised within six months after completion of the earthworks, and (g) there is no discharge of sediment from earthworks and/or flocculant into a surface water body, ephemeral watercourse, the coastal marine area, or onto land that may enter a surface water body, ephemeral watercourse or the coastal marine area, including via a stormwater network, and (h) erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body, ephemeral watercourse, or the coastal marine area, including via a stormwater network.

Ta	I	I.	<u> </u>	la	<u> </u>
	New	Support	Part 1 Schedule 1	Consistent with the	Retain.
activity.				RMA's purpose (in	
				conjunction with	
				further and	
				consequential	
				amendments	
				sought by Forest &	
				Bird).	
	New		Freshwater		
pastoral farming Rule P.R25: Farming activities on properties	Now	Amend	Freshwater	It is critical that	Amend to include "(e2) annual nitrogen fertiliser use, the annual stocking rate,
of between 4 hectares and 20 hectares –	INEW	Amenu	riesiiwatei	council has	
					and the winter stocking rate is provided to Wellington Regional Council
permitted activity.				information on	annually"
				land use pressures	
				to ensure they can	Retain balance of rule.
				appropriately	
		I	1	manage inputs and	
				set limits on	
				resource use, as	
				well as assess	
		I	1		
				effectiveness of the	
				plan. This means	
				information needs	
				to be provided by	
				landowners.	
9	New	Amend	Freshwater		Amend rule to require the reporting of N fertiliser and stocking rate regularly (this
hectares or more of land – permitted				on farm inputs	is what has been done in PC1 Waikato). Amend the rule to include additional
activity.				needs to be	conditions that will ensure dirnking water etc is protected, or amend Schedule 36
				required in the rule	to ensure those things are covered (see relief sought for schedule 36).
				to ensure council	, , ,
				has information on	
				pressures in the	
				ľ	
Table 0.5: Dhase in affarm and income	Name	Comment	Carabanatan	catchment	Data in
	New	Support	Freshwater	Ensures NPSFM	Retain
plans for Part Freshwater Management				outcomes can be	
Units.		I	1	met and there is	
				limited delay in	
			<u> </u>	implementation	
 Rule P.R27: The use of land for farming	New	Support	Freshwater	Helps give effect to	Retain
activities – discretionary activity.		l		NPSFM and RMA	
	New	Oppose	Freshwater	A change of land	Reclassify as a non-complying activity.
discretionary activity.				use could lead to	
				increase in	
				contaminants,	
				contrary to the	
				plan policies. This	
				l'	
				could potentially	
		I	1	lead to a decline in	
				water quality,	
				which is over-	
				allocation contrary	
				to NPSFM direction	
		L	l .	to or in an ection	

Rule P.R29: Farming activities – non-	New	Support	Freshwater	Ensures NPSFM	Retain
complying activity.				outcomes can be	
9.3.7 Take and use of water	New		Freshwater	met	
Rule P.R30: Take and use of water –	New	Amend	Freshwater	Further	Add an additional clause:
permitted activity.					(x) the rate of take from a river does not exceed whichever is the lesser of:
Political dollars,				l'	a) 10% of the instantaneous flow at the point and time of take, or
				l '	b) An absolute limit of 2.5 l/s.
Rule P.R31: Take and use of water –	New	Oppose	Freshwater	It is inappropriate	Delete Rule P.R31.
restricted discretionary activity.				to assign	
				Restricted	
				Discretionary	
				activity status (or	
				anything other	
				than prohibited) to	
				water takes below	
				a minimum flow or	
				water level. RD	
				status is	
				particularly	
				problematic in light	
				of the Policies,	
				which provide for	
				water to be	
				abstracted for	
				takes authorised	
				by existing	
				resource consents.	
				There is the	
				potential for	
				cumulative effects	
				from multiple takes	
				to cause effects	
				that may not be	
				easily detected	
				through individual	
Rule P.R32: Take and use of water –	New	Oppose	Freshwater	Flows, levels and	Delete Rule P.R32 and revise rule framework to enable existing consents to be
discretionary activity.				taken limits are a	brought in line with new flows and limits.
				mixture of policies	
				and rules when all	
				should be stated as	
				rules. See below.	

		Т			1 .	
	Rule P.R33: Taking and use of water that	New	Oppose	Freshwater	III-defined takes	Amend as follows:
	exceeds minimum flows or allocation				below minimum	In any catchment management unit listed in Table 9.6 the take and use of water
	amounts – prohibited activity.				flow and in	from a river, Category A groundwater or Category B groundwater , that does not
					exceedance of an	meet conditions (a) or (b) of Rule P.R31 that is not provided for in Rules R155,
					allocation limit do	R156, R159, R160, or P.R30 is a prohibited activity.
					not achieve	
					direction in the	
					NPSFM, GW RPS,	
					do not safeguard	
					the life-supporting	
					capacity	
					requirements for	
					indigenous species	
					and must be	
					prohibited.	
	Table 9.6: Minimum flows for Te Awarua-o-	New	Oppose	Freshwater	Oppose in part	Ensure limits are adequate to safeguarde aquatic ecosystems.
	Porirua Whaitua.					
	Table 9.7: Surface water allocation amounts	New	Oppose	Freshwater		
	for Te Awarua-o-Porirua Whaitua.					
					Oppose in part, as i	t uncertain these limits will ensure aquatic ecosystems and indigenous species are s
12 Schedules		Amended/New		Both		
	Schedule A: Outstanding water bodies	New	Amend	Part 1 Schedule 1	Outstanding water	List and map outstanding water bodies in the area that are
					bodies need to be	streams/rivers/wetlands, including Te Awakairangi, the Akatarawa River, and the
					listed and mapped.	Pakuratahi River.
	Schedule A2: Lakes with outstanding	New	Amend	Part 1 Schedule 1	Further detail is	List Indigenous fish diversity as a value of Lake Wairarapa (Wairarapa Moana).
	indigenous ecosystem values.				required to ensure	Note threatened fish species known to be present for each lake.
	,				values can be	· · ·
					protected	
	Schedule F: Ecosystems and habitats with	Amended	Neutral	Part 1 Schedule 1	Additional detail	Consider including additional detail in soon-to-be published DOC literature review
	significant indigenous biodiversity values.	, unended	Tredition.	Tare 2 Somedare 2	coming from DOC	of habitat requirements of native fish species
	Significant margenous bloatversity values.				report on habitat	or habitat requirements of hative hish species
					requirements of	
					native fish	
	Schedule F1: Rivers and lakes with	Amended	Cupport	Part 1 Schedule 1	nutive jish	Retain
		Amended	Support	Part 1 Schedule 1		Retain
	significant indigenous ecosystems.			5 1461 114		
	Schedule F2a: Significant habitats for	Amended	Support	Part 1 Schedule 1		Retain
	indigenous birds in rivers.		-			
	Schedule F2b: Significant habitats for	Amended	Support	Part 1 Schedule 1		Retain
	indigenous birds in lakes.					
	Schedule F2c: Significant habitats for	Amended	Support	Part 1 Schedule 1		Retain
	indigenous birds in the coastal marine area.					
	Schedule F4: Sites with significant	Amended	Support	Part 1 Schedule 1		Retain
	indigenous biodiversity values in the coastal					
	marine area.					
	Schedule F5: Habitats with significant	Amended	Support	Part 1 Schedule 1		Retain
	indigenous biodiversity values in the coastal					
	marine area.					
	Schedule 27: Freshwater Action Plan	New	Support	Part 1 Schedule 1	Meets NPSFM	Retain
	requirements.				requirements	
	A Freshwater Action Plans	New	Support	Freshwater	Meets NPSFM	Retain
	ATTESTITUTE ACTION TO INC.		Jappont	i i conwater	requirements	
	A1 Purpose	New	Support	Freshwater	Meets NPSFM	Retain
	ATT ui pose	IACAA	Support	i i estiwatei		inctain
					requirements	

A2 Freshwater Action Plans required in	New	Amend	Freshwater	Action plans are	Include "Habitat and natural form and character" under "Attributes for which
Whaitua Te Whanganui-a-Tara.				needed which	Freshwater Action Plan will be prepared" for all part FMUs which are rivers /
				addres	streams. That is,
				river/stream	Ōrongorongo, Te Awa Kairangi and Wainuiomata small forested and Te Awa
				habitat and	Kairangi forested mainstems
				natural form and	Te Awa Kairangi lower mainstem
				function to ensure	Te Awa Kairangi rural streams and rural mainstems
				this does not	Te Awa Kairangi urban streams
				continue to	Waiwhetū Stream
				degrade, and to	Wainuiomata urban streams
				meet council	Wainuiomata rural streams
				responsibilities	Parangarahu catchment streams and South-west coast rural streams
				under NPSFM	Korokoro Stream
				Policies 7 and 9,	Kaiwharawhara Stream
				and NPSFM	Wellington urban
				requirements to	Pouewe
				manage all 5	Takapū
				components of	Taupō
				ecosystem health	Te Rio o Porirua and Rangituhi
				and natural form	Wai-O-Hata
				and function. M39	
				also states action	
				plans will be	
				prepared for	
				nationally	
				threatened	
				freshwater species,	
				and states habitat	

A3 Freshwater Action Plans required in Te	New	Select stance	Freshwater	Action plans are	Include "Habitat and natural form and character" under "Attributes for which
Awarua-o-Porirua Whaitua.	INCW	Select stance	litesiiwatei	needed which	Freshwater Action Plan will be prepared" for all part FMUs which are rivers /
Awarda-0-i offida Wilaitda.				addres	streams. That is,
				river/stream	Orongorongo, Te Awa Kairangi and Wainuiomata small forested and Te Awa
				habitat and	Kairangi forested mainstems
				natural form and	Te Awa Kairangi lower mainstem
				function to ensure	Te Awa Kairangi rural streams and rural mainstems
				ľ	
				this does not continue to	Te Awa Kairangi urban streams Waiwhetū Stream
				degrade, and to	Wainuiomata urban streams
				meet council	Wainuiomata rural streams
				responsibilities under NPSFM	Parangarahu catchment streams and South-west coast rural streams Korokoro Stream
				Policies 7 and 9,	Kaiwharawhara Stream
				•	
				and NPSFM	Wellington urban
				requirements to	Pouewe
				manage all 5	Takapū
				components of	Taupō
				ecosystem health	Te Rio o Porirua and Rangituhi
				and natural form	Wai-O-Hata
				and function. M39	
				also states action	
				plans will be	
				prepared for	
				nationally	
				threatened	
				freshwater species,	
				and states habitat	
B Freshwater Action Plan requirements.	New	Support	Freshwater	Meets NPSFM	Retain
				requirements	
B1. Principles.	New	Select stance	Freshwater	Meets NPSFM	Retain
B2. General Content.	Now	Select stance	Freshwater	requirements	Retain
B2. General Content.	New	Select stance	Freshwater	Meets NPSFM	Retain
D2 N	NI	Calaatataaaa	Fueshousten	requirements	la sant
B3 Necessary actions.	New	Select stance	Freshwater	Additional wording	Insert
				is required to	He carlo back that and an and form and about a state to
				ensure natural	"For the habitat and natural form and character attributes:
				form and character	(a) undertake a program to assess the state of habitat and natural form and
				and habitat values	character across the region, and
				are protected and	(i) to monitor changes in habitat and natural form and character,
				maintained, and	(ii) to communicate changes through regular state of the environment reporting
				action is taken	(b) review river management and flood protection plans to ensure habitat and
					natural form and character is maintained or improved through management
					actions (a) investigate entires to strength an expect conditions on estivities which may
					(c) investigate options to strengthen consent conditions on activities which may
					affect habitat and natural form and character"
C. Freshwater Action Plans in Whaitua Te	New	Select stance	Freshwater	Meets NPSFM	Retain
Whanganui-a-Tara				requirements	
D Freshwater Action Plans in Te Awarua-o-	New	Select stance	Freshwater	Meets NPSFM	Retain
Porirua Whaitua				requirements	
					1
Schedule 28: Stormwater Contaminant	New	Support	Part 1 Schedule 1	Supports	
Schedule 28: Stormwater Contaminant Treatment.	New	Support	Part 1 Schedule 1	Supports achievement of	

	I- 11 4 - 11 12 1 11 6 2		I	In	Г	T
	Table 1: Target load Reductions for Copper	New	Support	Part 1 Schedule 1		
	and Zinc			5 1461 114		
	•	New	Select stance	Part 1 Schedule 1		
	Load Reductions for Copper and Zinc	NI -	Caladalas	Death Calculated		
	•	New	Select stance	Part 1 Schedule 1		
	Assessments.	NI -	0	De d 4 Cale al La 4	The second second second	Delay Calculate 20
	Schedule 30: Financial Contributions.	New	Oppose	Part 1 Schedule 1	The methodology	Delete Schedule 30.
					proposed in	
					Schedule 30 does	
					not follow the	
					effects	
					management	
					hierarchy and may	
					ultimately facilitate	
					adverse effects on	
					aquatic species,	
			1		the further	
					deterioration of	
					water quality and	
					ecosystem health -	
			1		contrary to RMA s	
					107(1), the NZCPS,	
			I		and the NPSFM.	
		New	Select stance	Part 1 Schedule 1		
	•	New	Select stance	Part 1 Schedule 1		
	·	New	Select stance	Part 1 Schedule 1		
	Unit					
		New	Select stance	Part 1 Schedule 1		
	Table D1. Financial contribution calculations	New	Oppose	Part 1 Schedule 1	Inconsistent with	Delete
	for residential greenfield development				NPSFM	
	Tale D2. Financial contribution calculations	New	Oppose	Part 1 Schedule 1	Inconsistent with	Delete
	for non-residential greenfield development				NPSFM	
	and new roads/state highways					
		New	Select stance	Part 1 Schedule 1		
	Schedule 31: Stormwater Management	New	Select stance	Part 1 Schedule 1		
	Strategy – Te Whanganui-a-Tara and Te					
	Awarua-o-Porirua.					
	Schedule 32: Wastewater Network	New	Select stance	Part 1 Schedule 1		
	Catchment Improvement Strategy.					
	Schedule 33: Vegetation Clearance Erosion	New	Support	Freshwater	Ensures NPSFM	
	and Sediment Management Plan.				can be effected	
					and sediment can	
			L		be managed	
	A Purposes of the Erosion and Sediment	New	Support	Freshwater	Ensures NPSFM	
	Management Plan				can be effected	
					and sediment can	
			I		be managed	
	B Management objectives	New	Support	Freshwater	Ensures NPSFM	
					can be effected	
					and sediment can	
					be managed	
1			1	1	1	1

	T	1	Т.	-	
C Requirements of the Erosion and	New	Support	Freshwater	Ensures NPSFM	
Sediment Management Plan				can be effected	
				and sediment can	
				be managed	
C1 Contents of the Erosion and Sediment	New	Support	Freshwater	Ensures NPSFM	
Management Plan				can be effected	
_				and sediment can	
				be managed	
D Amendment of Erosion and Sediment	New	Oppose	Freshwater	GWRC should have	
Management Plan				jurisdiction to	
Wanagement Flan				approve changes	
				to management	
				plans to ensure	
				they still meet	
				requirements to	
				adequately	
				manage sediment	
				risk	
Schedule 34: Plantation Forestry Erosion	New	Support	Freshwater	Ensures NPSFM	
and Sediment Management Plan.				can be effected	
				and sediment can	
				be managed	
A Purpose of the Erosion and Sediment	New	Select stance	Freshwater		
Management Plan					
B Management objectives	New	Select stance	Freshwater		
C Requirements of the Erosion and	New	Select stance	Freshwater	1	
Sediment Management Plan	INCW	Select starice	resilwater		
C1 Contents of the Erosion and Sediment	New	Neutral	Freshwater		
	inew	INEUTIAI	riesiiwatei		
Management Plan	Niew	Calastatanas	Facebooston		
C2 Certification of the Erosion and	New	Select stance	Freshwater		
Sediment Management Plan				<u> </u>	
D Amendment of Erosion and Sediment	New	Oppose	Freshwater	GWRC should have	
Management Plan				jurisdiction to	
				approve changes	
				to management	
				plans to ensure	
				they still meet	
				requirements to	
				adequately	
				manage sediment	
				risk	
Schedule 35: Small farm registration.	New	Amend	Freshwater	Provision of	Include requirement to report nitrogen fertiliser use.
John Caule 33. Siliali fattii registration.	IACAA	Amenu	i i conwatel	fertiliser	iniciade requirement to report filtrogen fertiliser use.
				r	Potain halance of schodule
				information is	Retain balance of schedule.
				critical to ensure	
				council is aware of	
				pressures on	
				catchment and can	
				set appropriate	
				limits on resource	
				use, and	
				complements	
				reporting of	
				stocking rates	

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	Schedule 36: Additional requirements for	New	Amend	Freshwater	Amendments	
	Farm Environment Plans in Whaitua Te				needed to ensure	
	Whanganui-a-Tara and Te Awarua-o-				effects are	
	Porirua Whaitua.				managed	
	A Certification requirements under the	New	Select stance	Freshwater		
	Resource Management (Freshwater Farm					
	Plans) Regulations 2023.					
	B Management objectives.	New	Amend	Freshwater	Amendments needed to ensure effects are managed	Management objective B should define 'revegetation' so that it means 'woody vegetation' or 'indigenous woody vegetation'. Otherwise it could be interpreted to mean grass, or weeds, etc. Management objective B should define 'not reasonably practicable' by setting out the circumstances or considerations that would make revegetation 'not reasonably practicable' or else it is up to a case-by-case assessment and could include considerations of cost or other goals of the farmer. If the 'not reasonably practicable' exemption is used, the certifier should assess the soil erosion control measures using an accepted methodology (not just estimating it). Management objective B should include not increasing nitrogen loss risk above the baselines in C(1) in order to maintain water quality and achieve
	C Content of a farm environment plan.	New	Amend	Freshwater	Councils need to collect information	policies of plan. Include requirements of annual reporting of stocking rates and fertiliser use
					on inputs as pressures in catchments	
	D Risk assessment and mitigation to	New	Neutral	Freshwater		
	address risk.	NI.	Nie i sel	F l l		
	Table D1 Sediment loss and transport risk factors	New	Neutral	Freshwater		
	E Erosion Risk Treatment Plan.	New	Amend	Freshwater		E erosion risk plan needs to have clear enforceable goals, and the provisions for critical source areas need to apply across the farm – not just on high erosion risk land.
	F Small stream riparian programme.	New	Amend	Freshwater	Setbacks are required to ensure (1) waterbodies	Amend to outline setback distance as a requirement, and to require revegetation of margins (with council support)
					are protected from	F small steam riparian programme needs to have clear enforceable goals; clear
					contaminants and	criteria for how to assess risk of erosion, deposition and damage to the stream
					(2) to ensure flood	bed (a stocking rate threshold may be a good alternative); and clear criteria for
					flows do not wash	when fencing is required, when it is not practicable, and how alternative
					away fencing	measures to fencing to minimise stock access to water will be assessed. As
					Additional	proposed, we are concerned they do not implement policies (e.g., WH.P26).
					requirements	
					needed to ensure	
					effects are	
					managed	
13 Maps		New		Both		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine	New	Support	Part 1 Schedule 1	Maps assist with plan	Retain
	area (Schedule F4).				interpretation.	
	Map 27: Sites with significant indigenous	New	Support	Part 1 Schedule 1	Maps assist with	Retain
	biodiversity values in the coastal marine		1		plan	
	area (Schedule F4) Insert 1: (Kāpiti).				interpretation.	
	area (Jeneaule 1 4) moert 1. (Napiti).			ı	J	I .

	New	Support	Part 1 Schedule 1	Maps assist with	Retain
biodiversity values in the coastal marine				plan	
area (Schedule F4) Insert 2: (Wellington				interpretation.	
Harbour).					
Map 27: Sites with significant indigenous	New	Support	Part 1 Schedule 1	Maps assist with	Retain
biodiversity values in the coastal marine				plan	
area (Schedule F4) Insert 2: Te Awarua-o-				interpretation.	
Porirua.					
Map 77: Habitats of nationally threatened	New	Support	Part 1 Schedule 1	Maps assist with	Retain
freshwater species – Te Awarua-o-Porirua				plan	
and Te Whanganui-a-Tara (Schedule F1).				interpretation.	
Map 78: Part freshwater management units	New	Support	Freshwater	Maps assist with	Retain
and target attribute state sites (rivers) – Te		''		, plan	
Awarua-o-Porirua.				interpretation.	
Map 79: Part freshwater management units	New	Support	Freshwater	Maps assist with	Retain
and target attribute state sites (rivers) – Te				plan	
Whanganui-a-Tara.				interpretation.	
Map 80: Part freshwater management units	New	Support	Freshwater	Maps assist with	Retain
and target attribute state sites (lakes) – Te		- apport		plan	
Whanganui-a-Tara.				interpretation.	
	New	Support	Freshwater	Maps assist with	Retain
management units for water takes – Te	IVEV	σαρροιτ	litesiiwatei	plan	inetalli
Awarua-o-Porirua.				interpretation.	
Map 82: Coastal water management units –	Now	Support	Part 1 Schedule 1	Maps assist with	Retain
Te Awarua-o-Porirua.	ivew	συρμοτί	Part I Schedule I	plan	Netalli
Te Awarda-0-Poritua.				interpretation.	
Map 83: Coastal water management units –	Now	Cupport	Part 1 Schedule 1	Maps assist with	Retain
Te Whanganui-a-Tara.	ivew	Support	Part I Schedule I	plan	Netalli
Te wildigaliul-a-Tara.				ľ	
Map 84: Harbour arm catchments – Te	New	Cupport	Part 1 Schedule 1	interpretation. Maps assist with	Retain
Awarua-o-Porirua.	ivew	Support		plan	Netalli
Awarua-0-Porti ua.				ľ	
Man OF: Drimary contact sites To	New	Cunnort	Freshwater	interpretation. Maps assist with	Retain
·	new	Support	Freshwater	l '	Retain
Whanganui-a-Tara.				plan	
Man 96: Unplanted grandfield	Now	Cupport	Dort 1 Cobodul - 1	interpretation.	Retain
	New	Support	Part 1 Schedule 1	Maps assist with	Retain
Porirua City Council.				plan	
Man 07. Handan	Niew	Commonst	Daniel Calair I. I. d	interpretation.	Data in
	New	Support	Part 1 Schedule 1	Maps assist with	Retain
Wellington City Council.				plan	
			D 1451 11 1	interpretation.	1
	New	Support	Part 1 Schedule 1	Maps assist with	Retain
Upper Hutt City Council.				plan 	
				interpretation.	
Map 89: Unplanned greenfield areas – Hutt	New	Support	Part 1 Schedule 1	Maps assist with	Retain
City Council.				plan	
				interpretation.	
	New	Support	Freshwater	Maps assist with	Retain
(Pasture) – Te Awarua-o-Porirua.				plan	
				interpretation.	
	New	Support	Freshwater	Maps assist with	Retain
vegetation) – Te Awarua-o-Porirua.				plan	
				interpretation.	

Map 92: H	lighest erosion risk land	New	Support	Freshwater	Maps assist with	Retain
(Plantation	n forestry) – Te Awarua-o-Porirua.				plan	
					interpretation.	
Map 93: H	lighest and high erosion risk land	New	Support	Freshwater	Maps assist with	Retain
(Pasture) -	– Te Whanganui-a-Tara.				plan	
					interpretation.	
Map 94: H	lighest erosion risk land (Woody	New	Support	Freshwater	Maps assist with	Retain
vegetation	nclearance) – Te Whanganui-a-				plan	
Tara.					interpretation.	
Map 95: H	lighest erosion risk land	New	Support	Freshwater	Maps assist with	Retain
(Plantation	n forestry) – Te Whanganui-a-				plan	
Tara.					interpretation.	
Map 96: N	Nākara catchment.	New	Support	Freshwater	Maps assist with	Retain
					plan	
					interpretation.	
Map 97: N	Nangaroa catchment.	New	Support	Freshwater	Maps assist with	Retain
					plan	
					interpretation.	