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								If a literal or officious interpretation of "does not compromise" is enforced or informs future lower order Resource Management Act documents, such as the Natural Resources Plan, then this could have significant unreasonable implications for the take and use of freshwater. WCC considers that a more reasonable approach is the use of the term "sustainably manages". WCC is open to other terminology considerations which would more readily cater for reasonable use.		
S4.002	Wellington City Council (WCC)	FS1.008	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	FS1.008	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	New objective TAP	Oppose	The key change sought (replacing "does not compromise" with "sustainably manages") is unclear and ambiguous	Disallow	Reject
S4.002	Wellington City Council (WCC)	FS2.007	FS2 NZ Transport Agency, Waka Kotahi	FS2.007	FS2 NZ Transport Agency, Waka Kotahi	New objective TAP	Support	The inclusion of the word 'sustainably manages' in place of 'does not compromise' appears to better align with the NPS-FM but as noted in the submission there are other terminology considerations which may also cater for reasonable use.	Allow	Accept
S4.003	Wellington City Council (WCC)			S4.003	Wellington City Council (WCC)	New objective TWT	Amend	Wellington City Context The proposed RPS visions are consistent with the Strategic Vision for Wellington (Wellington Towards 2040: Smart Capital) to be a climate-friendly, affordable, and welcoming eco-city to live for generations to come. Collectively, WCC's Three Waters network (drinking water, wastewater and stormwater) includes 2,653 km of pipes, 65 reservoirs, 103 pump stations, three treatment plants. WCC manages the global stormwater and wastewater discharge consents for the district and is thereby responsible for managing land-use and the stormwater and wastewater networks for Wellington. Infrastructure While active steps have been taken	<i>Objective TWT: Long-term freshwater vision for Te Whanganui-a-Tara: By the year 2100 a state of waiora is achieved for Te Whanganui-a-Tara in which the harbour, rivers, lakes, wetlands, groundwater, estuaries and coast are healthy, accessible, sustainable for future generations, and:</i> <i>1. The practices and tikanga associated with Te Whanganui-a-Tara are revitalized and protected; and</i> <i>2. Mahingakai are abundant, healthy, diverse and can be safely gathered by Taranaki Whānui and Ngāti Toa Rangatira and served to</i>	Accept

								<p>in improving the health and well-being of the environment within the WCC district, it should be noted that WCC has practical constraints in the management of its three waters network. As the network's infrastructure ages it requires higher levels of maintenance, which is also exacerbated by earthquake damage, as well as historical pressures on water infrastructure funding and uncertainty in future legislative requirements for the management of three waters infrastructure. WCC has funding constraints that will make it difficult to achieve significant improvements to network infrastructure quickly.</p> <p>Urban Development Wellington is projected to need an additional 30,407 dwellings over the next 30 years to satisfy urban growth demands. This will require significant infrastructure upgrades, which will be expensive and take years to undertake. A long-term approach will be needed to renew existing assets, provide for growth and ensure enhanced water quality outcomes can be delivered. It is important that both urban growth and water quality outcomes can be achieved. In this regard, a year 2100 target for achieving the proposed objectives of Variation 1 is supported. WCC would caution against reducing the vision's timeframes, as it is unlikely to be practicably achievable, for the previous stated reasons.</p> <p>Wellington City water quality improvements In the meantime, WCC is already engaging in multiple statutory and non-statutory processes to achieve water quality improvements, including:</p> <ul style="list-style-type: none"> <li>• Prioritised water infrastructure upgrades;</li> <li>• Development of a Green Network Plan to deliver the many</li> </ul>	<p><i>Taranaki Whānui and Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and</i></p> <p>3. <i>Havemaori/mouri that is nurtured, strengthened and able to flourish and restored natural character, have a natural water flow, and ecosystems that support an abundance and diversity of indigenous species; and</i></p> <p>4. <i>Provide for the safe access and use of all rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of recreational activities including fishing, fostering an appreciation of and connection to these waterbodies; and</i></p> <p>5. <i>Are taken care of in partnership with Taranaki Whānui and Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa and Taranaki Whānui that respects the mana of Te Whanganui-a-Tara and the whakapapa connection with Taranaki Whānui and Ngāti Toa Rangatira; and</i></p> <p>6. <i>Are resilient to the impacts of climate change; and</i></p> <p>7. <i>The use of water and waterways provide for social and economic use benefits provided that such use [does not compromise][delete] sustainably manages [underline] the health and well-being of waterbodies and freshwater ecosystems or the take and use of water for human health needs.</i></p>	
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								<p>ecological, social, economic, cultural and public health benefits to the central city;</p> <ul style="list-style-type: none"> <li>• Introduced requirements for Water Sensitive Urban Design into the WCC Proposed District Plan;</li> <li>• Introduced requirements for Hydraulic Neutrality into the WCC Proposed District Plan; and</li> <li>• Wellington Water (on behalf of WCC) has developed a draft stormwater management strategy. Proposed amendments</li> </ul> <p>WCC considers that the use of the terminology "does not compromise" is potentially inconsistent with 3.3(2)(b)&amp;(c) of the National Policy Statement - Freshwater Management. Using "does not compromise" is potentially fraught, as it could be argued that even minor environmental effects could result in a compromising of water quality. If a literal or officious interpretation of "does not compromise" is enforced or informs future lower order Resource Management Act documents, such as the Natural Resources Plan, then this could have significant unreasonable implications for the take and use of freshwater. WCC considers that a more reasonable approach is the use of the term "sustainably manages". WCC is open to other terminology considerations which would more readily cater for reasonable use.</p>		
S4.003	Wellington City Council (WCC)	FS2.008	FS2 NZ Transport Agency, Waka Kotahi	FS2.008	FS2 NZ Transport Agency, Waka Kotahi	New objective TWT	Support	The inclusion of the word 'sustainably manages' in place of 'does not compromise' appears to better align with the NPS-FM but as noted in the submission there are other terminology considerations which may also cater for reasonable use.	Allow	Accept
S5.001	Wellington Fish and Game Council			S5.001	Wellington Fish and Game Council	Overall variation	Support	WFGC is supportive of the inclusion of long-term visions for Te Awarua-o-Porirua Whaitua and Te Whaitua	N/A	Noted

								Whanganui-a-Tara into the GWRC RPS PC1as required by clause 3.3 of the NPS-FM 2020. WFGC is also supportive of the ecosystem and freshwater health focus of the freshwater visions as stated in this Variation 1.		
S5.001	Wellington Fish and Game Council	FS1.005	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	FS1.005	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	Overall variation	Support	The relief sought is consistent with the purpose and principles of the RMA	Allow	Noted
S5.002	Wellington Fish and Game Council			S5.002	Wellington Fish and Game Council	Overall variation	Not Stated	<p>However, the lack of consultation during the drafting process with WFGC as statutory managers of the sports fish and game bird resources, and the limited involvement with the wider community in the process (acknowledged in paragraphs 47, 49, and 50 of the Section 32 evaluation report of this Variation 1) raises concerns regarding whether the process of the NPSFM 2020 has been followed correctly, particularly Section 3. 2 (b), which requires every regional council to engage with communities and tangata whenua to identify long-term visions, environmental outcomes, and other elements of the NOF.</p> <p>The stating of these long-term visions will go on to inform environmental outcomes and target attribute states in the Natural Resources Plan, and therefore the long-term visions must be achieved through a democratic process involving the wider community.</p> <p>Further to this, the lack of communication with WFGC during the development of this Variation 1 is surprising, as the protections for the habitat of trout and salmon is enshrined in the Resource Management Act (1991), the</p>	N/A	Reject



								<p>Natural and Built Environments Act (2022), and the NPSFM (2020). As a leading advocate for wetland and freshwater habitat with statutory and legislative responsibilities, WFGC should have been involved in this process from the outset. While the acknowledgement of fishing and recreation in these long-term visions is well worded and expressed, it falls short of the mark in acknowledging the requirement to protect the habitat for trout and salmon insofar as this is consistent with protections of the habitats of indigenous freshwater species (Policies 10 and Policies 9 of the NPSFM 2020, respectively).</p> <p>The NPSFM 2020 also states in Appendix 1B (other values that must be considered), that where FMUs or parts thereof have fishing values, attributes associated with this fishing value (for both indigenous and valued introduced freshwater fish) need to be specifically targeted to allow the numbers of fish to be sufficient and suitable for human consumption. This information can only be ascertained in communication between those groups mandated to manage these resources and treasures, including Regional Council, tangata whenua/mana whenua, Fish and Game, and the Department of Conservation.</p>		
S5.002	Wellington Fish and Game Council	FS1.006	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	FS1.006	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	Overall variation	Support	The relief sought is consistent with the purpose and principles of the RMA	Allow	Reject
S6.001	The New Zealand Transport Agency (NZTA)			S6.001	The New Zealand Transport Agency (NZTA)	Overall variation	Support	Waka Kotahi is supportive of the intent of the Variation, including the visions proposed for Te Awarua-o-	N/A	Noted

								Porirua Whaitua and Te Whaitua Whanganui-a-Tara.		
S6.001	The New Zealand Transport Agency (NZTA)	FS1.016	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	FS1.016	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	Overall variation	Oppose	The submission is unclear as to what relief is sought	Disallow	Noted
S6.002	The New Zealand Transport Agency (NZTA)			S6.002	The New Zealand Transport Agency (NZTA)	New objective TAP	Amend	Waka Kotahi submits in support of the objectives as notified but may seek amendments for clarity as result of its ongoing engagement with GWRC and mana whenua/tangata whenua. An example of the clarity is point four in both proposed objectives which relate to access to waterbodies and whether this raises health and safety or other effects which such locations include infrastructure.	N/A	Accept in part
S6.002	The New Zealand Transport Agency (NZTA)	FS1.017	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	FS1.017	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	New objective TAP	Oppose	The submission is unclear as to what relief is sought	Disallow	Reject
S6.003	The New Zealand Transport Agency (NZTA)			S6.003	The New Zealand Transport Agency (NZTA)	New objective TAP	Amend	Waka Kotahi submits in support of the objectives as notified but may seek amendments for clarity as result of its ongoing engagement with GWRC and mana whenua/tangata whenua. An example of the clarity is point four in both proposed objectives which relate to access to waterbodies and whether this raises health and safety or other effects which such locations include infrastructure.	N/A	Accept in part
S6.003	The New Zealand Transport Agency (NZTA)	FS1.018	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	FS1.018	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	New objective TAP	Oppose	The submission is unclear as to what relief is sought	Disallow	Reject
S7.001	Winstone Aggregates			S7.001	Winstone Aggregates	Overall variation	Neutral		N/A	Noted
S7.001	Winstone Aggregates	FS1.019	FS1 Royal Forest and Bird Protection	FS1.019	FS1 Royal Forest and Bird Protection Society of New	Overall variation	Oppose	The submission is unclear as to what relief is sought	Disallow	Noted

			Society of New Zealand Incorporated		Zealand Incorporated					
S7.002	Winstone Aggregates			S7.002	Winstone Aggregates	New objective TWT	Support	<p>Winstone support the identification of the long-term visions for Te Whanganui-a-Tara and Te Awaruao-Porirua, noting that their Belmont Quarry is located with the Te Whanganui-a-Tara Whaitua. Winstone particularly support the clause (7) of Objective TWT...</p> <p>Recognising the beneficial use of water and waterways is fundamental to ensuring the long-term prosperity of Te Whanganui-a-Tara. Relevant to Winstone, this recognition extends to quarrying activities as one of those beneficial activities. The ongoing ability for the Wellington Region to access locally sourced aggregate, including Belmont Quarry, will be essential for their long-term future. Aggregate plays a vital role in the creation of new housing, businesses, roads, cycleways, and three waters infrastructure. Additionally, the Wellington Region is projected to grow by 200,000 people by the year 2050 and will require an additional 99,000 homes . There are also various transport infrastructure projects that will occur over the short- to medium-term, including:</p> <ul style="list-style-type: none"> <li>• Let's Get Wellington Moving,</li> <li>• Rail improvements,</li> <li>• Otaki to North Levin,</li> <li>• Cycleways and shared paths,</li> <li>• State Highway 55 improvements,</li> <li>and</li> <li>• The West-East Connection.</li> </ul>	To retain recognition of the beneficial use of water and waterways in the long-term vision for Te Whanganui-a-Tara.	Accept in part
S7.002	Winstone Aggregates	FS1.020	FS1 Royal Forest and Bird Protection Society of New	FS1.020	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	New objective TWT	Oppose	The submission is unclear as to what relief is sought	Disallow	Reject

			Zealand Incorporated							
S7.003	Winstone Aggregates			S7.003	Winstone Aggregates	Overall variation	Not Stated	While the Section 32 Evaluation states that the visions have been based on statements provided in the Whaitua Implementation Plan for each Whaitua, there has been limited engagement with communities and tangata whenua on the visions themselves. Most notably, Taranaki Whānui, being one of the two mana whenua over the Whaitua which the visions apply to, were unable to meaningfully engage in providing feedback due to the time constraints	Further consideration is given to whether Clause 3.3(3) of the NPS-FM has been met.	Reject
S7.003	Winstone Aggregates	FS1.021	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	FS1.021	FS1 Royal Forest and Bird Protection Society of New Zealand Incorporated	Overall variation	Oppose	The submission is unclear as to what relief is sought	Disallow	Accept