

Wellington Water Limited

Submission on Greater Wellington Regional
Councils Variation 1 to Plan Change 1

26 January 2026



Submission on Greater Wellington Regional Councils Variation 1 to Plan Change 1

Clause 6 of Schedule 1, Resource Management Act 1991

To: Environmental Planning, Greater Wellington Regional Council

Via email to regionalplan@gw.govt.nz

1. This is a submission from Wellington Water Limited (Wellington Water) on Greater Wellington Regional Councils Variation 1 to Plan Change 1 (Variation 1).
2. The email address for service is: resourcemanagement@wellingtonwater.co.nz.
3. Wellington Water could not gain advantage in trade competition through this submission.
4. Wellington Water seeks the relief set out in its substantive submission, including the attached table which sets out amendments sought to the provisions.
5. Wellington Water wishes be heard in support of this submission.
6. If others make a similar submission, Wellington Water will consider presenting a joint case with them at the hearing.
7. Wellington Water is willing to work with Greater Wellington Regional Council (Greater Wellington) in advance of the hearing.



Katherine Viskovic
Head of Resource Management and Environment
26 January 2026

Wellington Water works with Councils to deliver Three Waters services

1. Wellington Water Limited ('Wellington Water') is the Wellington region's water services provider. Wellington Water is council owned and funded by:
 - a. Wellington City Council;
 - b. Porirua City Council;
 - c. Lower Hutt City Council;
 - d. Upper Hutt City Council;
 - e. South Wairarapa District Council; and
 - f. Greater Wellington.
2. Wellington Water provides safe and healthy drinking water, collects and treats wastewater, and ensures the stormwater network is well managed. While Wellington Water operates the three waters network, our six shareholding councils own the water infrastructure, set policies, user charges and control rates.
3. Wellington Water provides advice on council assets, and councils make policy and funding decisions through Long-Term Planning processes. Wellington Waters prioritises work to make the best use of time, funding, and resources.

Tiaki Wai – Metro Water

4. The five councils covering the Wellington metropolitan area (Wellington City Council, Hutt City Council, Porirua City Council, Upper Hutt City Council and Greater Wellington) have established a new, jointly owned organisation to deliver water services to their communities. The new water entity has been legally established with the name Tiaki Wai Limited, and will take accountability for water services for these districts from 1 July 2026.¹

Wellington Water's submission on Variation 1

5. As the land development advisors to Wellington, Porirua and Upper Hutt City Councils, Wellington Water seeks to ensure that Variation 1 provides workable provisions to support our role advising Councils on new connections to the network. We support the amendments to the timeframes regarding financial contributions, for the reasons provided below. We support in part the amendments to the timeframes related to provisions regards hydrological controls. However, request that additional clarity is provided to plan users in Wellington City Council's jurisdiction where hydrological controls are required to be provided in accordance with district plan requirements.

Wellington Water supports a change of date regarding payment of financial contributions

6. Wellington Water supports the concept of financial contributions proposed in Plan Change 1 to the Natural Resources Plan (PC1), however, appreciates that GWRC needs time establish the appropriate way to manage and administer financial contributions before relevant provisions can be implemented in full.

¹ Water services associated with South Wairarapa District Council will not be within the remit of Tiaki Wai but part of the future Wairarapa Tararua water services provider.

7. As discussed above, Wellington Water will transition into Tiaki Wai and requires time to ensure financial contributions can be administered by that new entity. This matter is being considered as part of the wider transition planning led by the Tiaki Wai establishment programme team working with Wellington Water.
8. For these reasons, Wellington Water support the amendments proposed by Variation 1 regarding financial contributions.

Wellington Waters submission requests a greater degree of clarity for how hydrological controls are implemented (in Wellington City Councils jurisdiction) before a decisions version of PC1 is notified

9. Wellington Water’s land development team currently provides technical water advice to metropolitan city councils (excluding Hutt City Council), to ensure proposed designs for residential, commercial and industrial developments meet the requirements of relevant water regulations. This advice is sought and provided to councils in the context of consideration of resource consent applications.
10. Wellington Water understands that Greater Wellington has received feedback from plan users regarding the workability of PC1 provisions related to hydrological controls and acknowledges the need to amend these provisions, so they cannot be considered by decision makers until a decisions version of PC1 is notified.
11. As sought in Wellington Water’s original submission on PC1 (in 2023), more specificity in provisions regarding hydrological controls is required to support effective implementation of these provisions by Wellington Waters land development team.
12. In that submission Wellington Water requested that:

“relevant provisions in the NRP should be amended to contain clear, detailed and specific direction regarding the hydrological control standards to be met. Wellington Water would generally support standards based on a specified depth of rainfall retention (e.g. retention of the first 5mm of rainfall depth).”
13. Please note the relief sought by Wellington Water in 2023 regards hydrological controls remains a relevant concern for Wellington Water in 2025, to be addressed through hearings on PC1.
14. We also note that Wellington City Council’s district plan contains provisions related to hydrological controls (THW R4, R5 and R6) which will need to continue to be assessed by Wellington Water’s land development team when providing technical advice to Wellington City Council. Similar rules may be introduced into other district plans in the future.
15. Wellington Water seeks that an advice note is added for Rule WH.R5 to provide clarity to plan users to ensure other relevant district plan requirements regarding hydrological controls are not overlooked.

Decisions Requested

Variation 1 is identified with underlining for additions and ~~strike through~~ for deletions, **in red**, whereas Wellington Water’s requested amendments to Variation 1 are set out **in blue**.

Decisions sought

#	Section	Provision	Position	Reasons	Relief sought
1.	8.3 Rules	<p>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity</p> <p>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met:</p> <p>(a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 (baseline property existing impervious area as at 30 October 2023) and</p> <p>(b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and</p> <p>(c) from the date the decisions on submissions to Proposed Plan change 1 for the Natural Resources Plan for the Wellington Region (2023) is publicly notified, the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network):</p> <p>(i) for all impervious areas associated with a greenfield development, or</p> <p>(ii) for all redeveloped and new impervious areas involving greater than 30m2 of impervious area of a redevelopment (of an existing urbanised property), and.....</p> <p>Note: In addition to the requirements regarding hydrological controls in this provision, there may also be relevant rules in the applicable district plan.</p>	Support in part	<p>Wellington Water understands that Greater Wellington has received feedback from plan users regarding the workability of PC1 provisions related to hydrological controls and acknowledges the need to amend these provisions, so they cannot be considered in consent decisions until a decisions version of PC1 is notified.</p> <p>To ensure clarity is provided to plan users (before a decisions version of PC1 is notified), Wellington Water suggests that a note is added below Rule WH.R5, that hydrological controls are still required to be considered in new proposed development under Wellington City Council’s district plan.</p>	Retain as drafted, but add a note below Rule WH.R5 to clarify that hydrological controls remain a requirement for new proposed developments under Wellington City Councils district plan, via THW R4, R5 and R6.
2.	8.3 Rules	<p>Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity</p> <p>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met:</p> <p>(a) the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m2 (baseline property existing impervious area as at 30th October 2023) and</p> <p>(b) all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials and</p> <p>(c) from the date the decisions on submissions to Proposed Plan change 1 for the Natural Resources Plan for the Wellington Region (2023) is publicly notified, the proposal provides hydrological control measures (for example</p>	Support in part	<p>Wellington Water understands that Greater Wellington has received feedback from plan users regarding the workability of PC1 provisions related to hydrological controls and acknowledges the need to amend these provisions, so they cannot be considered in consent decisions until a decisions version of PC1 is notified.</p>	Retain as drafted.

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		rain tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network): (i) for all impervious areas associated with a greenfield development, or (ii) for all redeveloped and new impervious areas involving greater than 30m2 of impervious area of a redevelopment(of an existing urbanised property), and.....			
3.	Schedules	Schedule 30: Financial Contributions Financial contributions shall be imposed as a condition of consent. Financial contributions imposed via conditions of consent during the period of 23 October 2023 and 1 June 2027 shall be paid no earlier than 1 June 2027, and no later than 31 December 2027. Financial Contributions imposed via a condition of consent from 02 June 2027 must be paid in accordance with the timeframes detailed within the consent condition, and will be collected prior to the consent being given effect to	Support	Wellington Water supports the concept of financial contributions proposed in Plan Change 1 to the Natural Resources Plan, however, appreciates that Greater Wellington needs time to set itself up in terms administering financial contributions before relevant provisions can be implemented.	Retain as drafted.