



Section 32 report: Ki uta ki tai – mountains to the sea

for the Proposed Natural Resources Plan for the
Wellington Region

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1. Overview and purpose

This report provides an analysis of the appropriateness of the proposed objectives, policies and methods contained in the Proposed Natural Resources Plan for the Wellington Region (proposed Plan) related to ki uta ki tai, i.e. managing natural resources in a manner that acknowledges connectivity.

The analysis in this report is guided by the requirements of section 32 of the Resource Management Act 1991 (RMA).

The term “ki uta ki tai” can be translated into English as “mountains to the sea”. For the purpose of the proposed Plan the principles of ki uta ki tai are based on improving the integrated management of our natural and physical resources. These principles recognise the connections between surface water and groundwater, between land use and water quality, between water quantity and water quality, and between fresh water and the coast. The principles also recognise the connections between and among people and communities.

The concept of ki uta ki tai is used as a framework in the proposed Plan, as discussed in the report, “Introduction to the Resource Management Act 1991 section 32 reports”. Because integrated management is so comprehensive, the reader is directed to review each of the other section 32 reports prepared for the proposed Plan to gain a full assessment of the proposed objectives, policies and methods related to ki uta ki tai.

In particular, the report, “Section 32 report: Water quantity”, and the report, “Section 32 report: Water quality”, provide important assessments on provisions related to ki uta ki tai. These include assessments of provisions specific to water allocation and the achievement of water quality outcomes.

Other reports of most relevance to ki uta ki tai include: “Section 32 report: Māori values” and “Section 32 report: Beneficial use and development”.

1.1 Scope of this report

The proposed Plan contains five over-arching objectives related to achieving ki uta ki tai, or integrated management of natural resources across the region. These objectives operate at different scales and cover various aspects of resource management. This report assesses, in accordance with section 32 of the RMA, three of these objectives, which relate to the following matters:

- Ki uta ki tai (Objective O1)
- Intrinsic values and life-supporting capacity (Objective O4)
- Fresh and coastal water (Objective O5)

Objective O1 addresses the use of ki uta ki tai as a management approach. Objective O4 recognises intrinsic values and life-supporting capacity. Objective O5 addresses the need to safeguard the shared values of aquatic ecosystem health and mahinga kai, to provide for contact recreation and Māori

customary use and, in the case of freshwater, to provide for the health needs of people.

The two additional over-arching objectives for ki uta ki tai which are not assessed in this report are proposed Objectives O2 and O3. Objective O2 is associated with recognising the importance and contribution of land and water to the social, economic and cultural well-being of the community. This objective is assessed in the report, “Section 32 report: Beneficial use and development”. Objective O3 is to sustain and enhance mauri. This objective is assessed in the report, “Section 32 report: Māori values”.

In addition to the five over-arching objectives, the proposed Plan contains a suite of other objectives that together enable the proposed Plan to achieve ki uta ki tai. As noted above, these objectives and the provisions that implement them are assessed in several separate section 32 reports.

The use of catchment-specific (whaitua) chapters in the proposed Plan, which will be amended through variations and plan changes, is discussed in section 2.3 of this report. At the time of notification of each proposed variations and plan changes, section 32 reports will be provided that are specific to each of the future proposed provisions.

This report is limited to providing an assessment of the effectiveness and efficiency, in accordance with section 32 of the RMA, of the provisions related to achieving integrated catchment management which are not covered in other reports. The provisions assessed within this report include the policy direction, rules and other methods specific to:

- The principles of ki uta ki tai and integrated catchment management
- Cross-boundary matters
- The precautionary approach
- Review of existing consents
- Grant of consents with common review and expiry dates

1.2 Legislative background

The Wellington Regional Council’s (WRC) approach to ki uta ki tai in the proposed Plan is guided by the direction in Part 2 and section 30 of the RMA, the National Policy Statement for Freshwater Management 2014, the New Zealand Coastal Policy Statement 2010 and the Regional Policy Statement for the Wellington region.

1.3 Report methodology

To fulfil the requirements of section 32(2) of the RMA, this report identifies and assesses the benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposed provisions relating to ki uta ki tai.

In accordance with section 32(2), the analysis identifies the opportunities for economic growth that are anticipated to be provided or reduced and the employment that is anticipated to be provided or reduced.

In addition, the analysis, where practicable, quantifies the benefits and costs and assesses the risk of acting or not acting if there is uncertain or insufficient information.

The structure of the report is shown below:

- Development of the proposed Plan: a refinement of the main issues identified by the community related to ki uta ki tai, and a discussion of Te Upoko Taiao – Natural Resource Management Committee and the use of whaitua-specific chapters (section 2 of this report)
- Regulatory and policy context: identification of relevant national and regional legislation and policy direction (section 3 of this report)
- Operative regional freshwater, soil, discharges to land and coastal plans: a review of the approach in the operative plans in regards to integrated management of the region’s natural and physical resources (section 4 of this report)
- Appropriateness of the objectives: an evaluation of the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the RMA, as required by section 32(1)(a) (section 5 of this report)
- Efficiency and effectiveness of the policies, rules and methods: an assessment of the efficiency and effectiveness of the provisions as to whether they are the most appropriate way to achieve the objectives, in accordance with sections 32(1)(b) and 32(2) (section 6 of this report).

2. Development of the proposed Plan

2.1 Resource management issues

WRC began a region-wide engagement with the community in 2010 to gather the views of the community about natural resource management. This engagement involved conversations with iwi partner organisations, the general public, agencies and organisations with interests in resource management, resource users, school children, developers and policy-makers. Through this work, the issues were defined that were relevant to the second generation regional plan (Parminter 2011).

A common theme strongly voiced at public workshops and by mana whenua iwi groups was for WRC to adopt an integrated approach to the management of the region’s natural resources. At all 27 public workshops there was general comment on the need for planning relating to use, and the appropriate management of natural resources to be integrated (Parminter 2013). Two of the mana whenua groups supported an integrated catchment management approach. In addition, many stakeholder groups also expressed support for integrated catchment management of land and water.

From these efforts, several resource management issues were identified about the need to manage cumulative effects, uncertainty, and risk through integrated catchment management. These issues and others were compiled in a report published by WRC (GWRC 2014). The key issues related to ki uta ki tai are:

Issue 1.1: Land, fresh water and the coast are valued for a variety of reasons and are under pressure from multiple, and sometimes competing, uses and developments which are having a cumulative adverse effect on the health and function of fresh water and coastal resources.

Issue 1.2: The lower reaches of rivers, lakes, estuaries and harbours are places where there is an accumulation of adverse effects of human activities on land, in water bodies and on the coast.

Issue 1.3: Climate change is causing a rise in sea level and is altering patterns and distribution of rainfall, modifying local climate and exacerbating the effects of natural hazards.

Issue 1.4: Natural hazards adversely affect our communities and people, property, infrastructure, businesses, taonga raranga and wāhi tapu.

Issue 1.7: Climate change and sea level rise will exacerbate the risk from natural hazards requiring comprehensive risk management planning.

Issue 1.9: There are areas and sites of significance to tangata whenua that are at risk of degradation or are threatened by human activities.

Issue 1.11: Indigenous ecosystems and ecosystems of importance to indigenous species are significantly reduced in extent and continue to be degraded. Ecosystem health and function across the region is compromised.

Issue 1.12: Regionally significant infrastructure can have adverse effects on the surrounding environment, including people and communities but enables communities to provide for their social, economic and cultural well-being.

Issue 1.14: Degradation and destruction of historic heritage places, sites and areas, including those significant to Māori, results in the loss of significant historic heritage and the associated values.

Issue 3.14: Some existing decentralised and on-site wastewater systems discharge partially treated sewage and nutrients into the region's groundwater, surface water bodies and the coastal marine area. The discharges are likely to be due to a combination of poor design, inappropriate location, and inadequate maintenance and can lead to cumulative effects where multiple systems are used.

Issue 4.1: The ecosystem health and function of water bodies is being degraded by contaminated discharges from urban and rural land use, and the abstraction of water.

Issue 4.3: Land uses and discharges of contaminants reduce the quality of water bodies.

Issue 5.2: Some land-use practices increase the volume and velocity of stormwater discharges raising the risk of flooding, scouring of streambed habitat, bank instability and erosion.

Issue 6.3: Land uses and discharges of contaminants reduce the quality of coastal water.

Issue 6.4: Activities and structures in the coastal marine area continue to degrade the natural character of the coastal environment.

2.2 Te Upoko Taiao

The proposed Plan was developed under the guidance of Te Upoko Taiao – Natural Resource Management Committee. Te Upoko Taiao comprises seven elected councillors and seven appointed mana whenua members. The committee was created as an expression of Treaty of Waitangi relationship at a regional level, enabling a mana whenua perspective in resource management. The committee is delegated as the decision-making body for the development of the regional plan.

As shown in Figure 1 below, Te Upoko Taiao adopted ki uta ki tai as one of the five principles for decision-making. Ki uta ki tai is inextricably connected with the other four guiding principles. The five guiding principles are:

- Ki uta ki tai
- Identity/wairuatanga
- Judgement based on knowledge/tō mātou whakapono
- Partnership/mahitahi
- Guardianship/kaitiakitanga

The report entitled, “Introduction to the Resource Management Act 1991 Section 32 reports”, provides an overview of Te Upoko Taiao and the five guiding principles that the committee established for the development of the regional plan.

PRINCIPLES TO GUIDE THE REVIEW OF REGIONAL PLANS

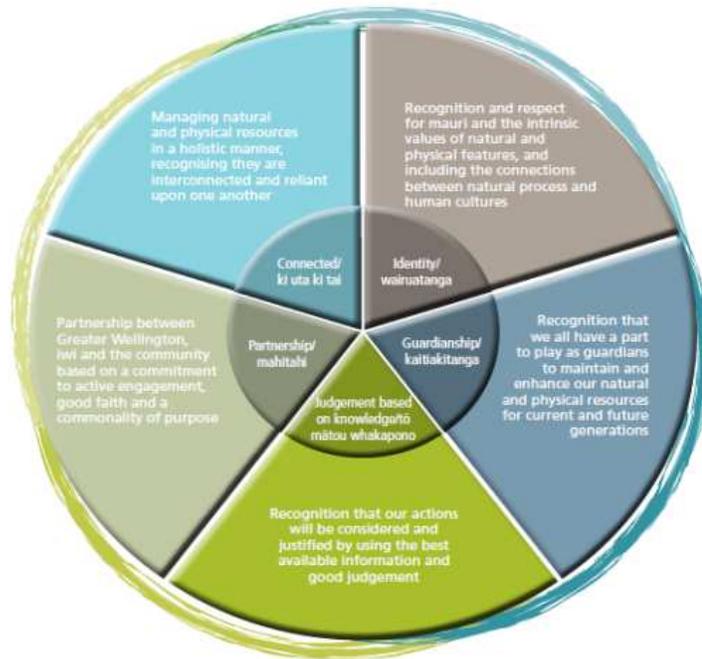


Figure 1: Principles used to guide decision-making during the development of the proposed Plan

2.3 The whaitua – a framework for integrated catchment management

WRC, through the delegated authority of Te Upoko Taiao – Natural Resource Management Committee, has designed the proposed Plan to achieve ki uta ki tai through a series of five whaitua-specific variations and plan changes. These variations and plan changes will be based on recommendations developed by whaitua committees using collaborative decision-making.

Whaitua is a te reo Māori word that can be translated as a site, region, space or designated area. For the purpose of the proposed Plan, whaitua is a geographic concept used to describe (singularly and collectively) the five environmental management areas within the Wellington Region.

The five whaitua are the Wairarapa Coast; Ruamāhanga; Wellington Harbour (Port Nicholson) and Hutt Valley; Te Awarua-o-Porirua; and Kāpiti Coast as shown in Figure 2 below. Whaitua will be the geographic basis to identify the values of fresh and coastal waters, recommend catchment and site-specific methods to maintain or improve these values, and implement integrated catchment management.

In each whaitua, collaboration, based around a whaitua committee will be used to make recommendations on freshwater and coastal water objectives and limits, in accordance with the National Policy Statement for Freshwater Management 2014 (NPS-FM). These recommendations will be delivered in a

whaitua implementation programme (WIP), which WRC will incorporate into the whaitua-specific chapters of the regional plan through variations and plan changes.

The first whaitua committee, the Ruamāhanga whaitua committee, was established in December 2013. The Te Awarua-o-Porirua whaitua committee was initiated in 2015 and the remaining whaitua committees will be progressively rolled out over the next five years (see Table 1 below). This process is described in the WRC’s timetable for the progressive implementation of the NPS-FM (GWRC 2012), as is required by NPS-FM Policy E1(c) for councils taking a progressive approach to implementing the NPS-FM by 2025.

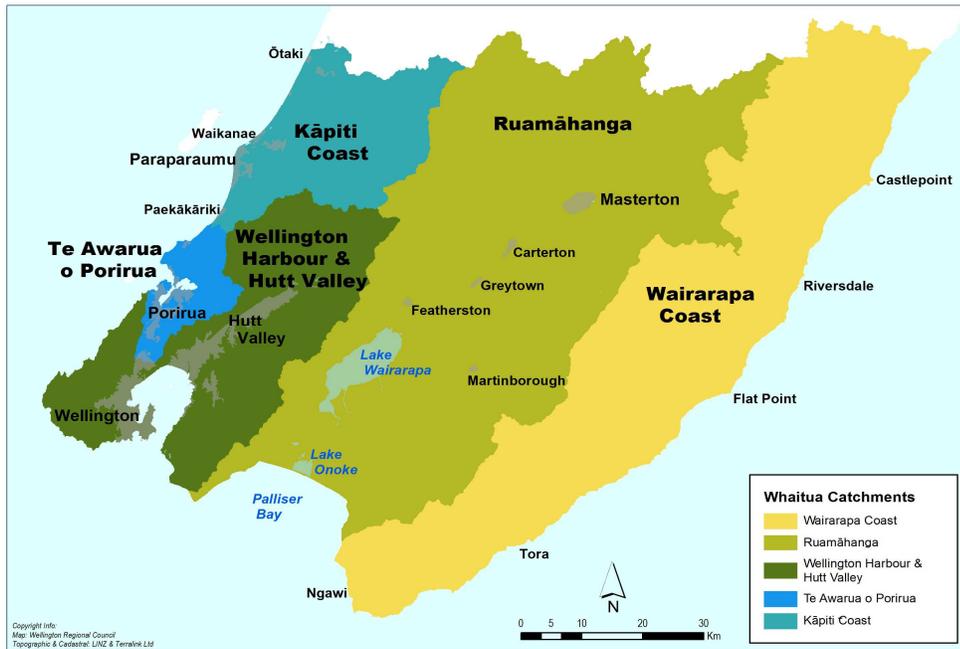


Figure 2: Map illustrating the boundaries of the five whaitua

Table 1: Approximate whaitua committee commencement and completion dates

Whaitua	Commencement	WIP to be completed
Ruamāhanga	December 2013	2015
Te Awarua-o-Porirua Harbour	January 2015	2017
Wellington Harbour (Port Nicholson) and Hutt Valley	2015	2017
Kāpiti Coast	2016	2018
Wairarapa Coast	2017	2019

3. Regulatory and policy context

3.1 International

Integrated management of natural and physical resources is comprehensive and recognises connections land and water, water quantity and water quality, fresh water and the coast, and between people and communities. Integrated management also recognises that complete information on these connections is not always available to guide decision making, and therefore a precautionary approach is relevant.

The precautionary approach is based on the precautionary principle (Principle 15) in The Rio Declaration on Environment and Development (1992) from the United Nations:

In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

This principle is widely used in New Zealand legislation related to resource management. For example, as noted in the guidance document for the New Zealand Coastal Policy Statement (DOC 2010), the precautionary approach is implicit in the RMA, the Fisheries Act 1996, the Hazardous Substances and New Organisms Act 1996, the Civil Defence Emergency Management Act 2002, the Biosecurity Act 1993 and the New Zealand Biodiversity Strategy 2000.

When considering an application for resource consent, WRC must have regard to any other matter that is relevant and reasonable necessary to determine the application in accordance with section 104(1)(c) of the RMA. This “other matter” often includes matters of risk, uncertainty and the precautionary principle.

3.2 National level

3.2.1 Resource Management Act 1991

The purpose of the Resource Management Act 1991 (RMA) is to promote the sustainable management of natural and physical resources. Part 2 of the RMA defines sustainable management in a way that recognises the connections between the use, development and protection of natural and physical resources with the provision of social, economic and cultural well-being. These are the principles of integrated management.

Regional councils are required to give effect to the RMA through the establishment, implementation and review of objectives, policies and methods to achieve integrated management of the natural and physical resources of the region (section 30(1)(a)). This includes the control of the use of land for maintaining and enhancing water quality and aquatic ecosystems, and maintaining water quantity, under section 30(1)(c).

In regard to cross-boundary issues, section 66(2)(d) of the RMA requires WRC to have regard to the extent to which the proposed Plan needs to be consistent with the regional policy statements and plans, or proposed regional policy statements and proposed Plans, of adjacent regional councils.

Section 67(2) states that regional plans may contain processes for dealing with issues that cross local authority boundaries, that arise between territorial authorities, or that arise between regions.

Sections related to the duration and review of consents are also of relevance to the assessment in this report. In particular, section 123 sets out the requirements of consent duration. Section 128 sets out the circumstances when the conditions of consent can be reviewed.

3.2.2 National Policy Statement for Freshwater Management 2014

Integrated catchment management is integral to the National Policy Statement for Freshwater Management 2014 (NPS-FM), which requires regional councils to:

- Establish objectives and set limits for freshwater quality and quantity in their regional plans, and
- Improve integrated catchment management for fresh water, including the interactions between land use, fresh water and the coastal environment

Provisions in the NPS-FM that are particularly relevant to ki uta ki tai include Objective C1 and Policies C1 and C2 which state:

Objective C1

To improve integrated management of fresh water and the use and development of land in whole catchments, including the interactions between fresh water, land, associated ecosystems and the coastal environment.

Policy C1

By every regional council managing fresh water and land use and development in catchments in an integrated and sustainable way, so as to avoid, remedy or mitigate adverse effects, including cumulative effects.

Policy C2

By every regional council making or changing regional policy statements to the extent needed to provide for the integrated management of the effects of the use and development of:

- (a) land on fresh water, including encouraging the co-ordination and sequencing of regional and/or urban growth, land use and development and the provision of infrastructure; and*
- (b) land and fresh water on coastal water.*

The NPS-FM also requires regional councils to establish freshwater objectives and set freshwater quality and quantity limits. This process is described in the WRC's timetable for the progressive implementation of the NPS-FM (GWRC 2012). This will be achieved, in part, through variations and plan changes (see section 2.3 of this report) and is discussed in more detail in the reports, "Section 32 report: Water quality", and "Section 32 report: Water quantity".

3.2.3 New Zealand Coastal Policy Statement 2010

The direction in the New Zealand Coastal Policy Statement 2010 (NZCPS) on the use of integrated management of the coastal environment and the use and development of land, including the interactions between fresh water, land and associated ecosystems is not as specific as in the NPS-FM, although the NZCPS provides direction on inter-agency management and controlling land use to protect and enhance coastal waters.

NZCPS Policy 4 seeks integrated management of natural and physical resources in the coastal environment and activities that affect the coastal environment. This policy requires co-ordinated management or control of activities, collaboration with other bodies and agencies, and consideration of specific issues such as land use impacts on water quality. The NZCPS acknowledges that diffuse sources of contamination can result in poor and declining coastal water quality.

Policies 21, 22 and 23 of the NZCPS provide direction on land use controls and management of the discharge of contaminants for the protection and enhancement of coastal water quality.

Policy 3 is clear that a precautionary approach should be used for activities where the information on potential effects is lacking but potentially significant. The policy specifically directs the use of the precautionary approach towards proposed activities whose effects on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse. Policy 3 also directs a precautionary approach to use and management of coastal resources potentially vulnerable to the effects from climate change.

3.3 Regional level

3.3.1 Regional Policy Statement for the Wellington region

The Regional Policy Statement for the Wellington region (RPS) provides an overview of the resource management issues for the region, and the policies and methods required to achieve the integrated management of the region's natural and physical resources. The RPS was made operative in 2013, and it provides strong direction for the regional plan to manage resources in an integrated way, use a precautionary approach, and address cross-boundary issues through working collaboratively with city and district councils.

For example, the explanation for Policy 6 recognises the need for Porirua City Council, Wellington City Council and WRC to work in a coordinated manner to protect and restore Te Awarua-o-Porirua Harbour (referred to as Porirua Harbour in the RPS). Policies 14 and 42 recognise the need for integration to manage the adverse effects of stormwater discharges.

Policy 64 is a non-regulatory policy that supports a whole-of-catchment approach, and Methods 26-47 set out actions for WRC, city and district councils, iwi authorities and others to manage resources in an integrated way. For example, Method 29 states that WRC and the city and district councils will take a whole-of-catchment approach that recognises the inter-relationships between the values of natural resources when undertaking and planning works, operations and services. These methods seek to ensure that where resources are managed by more than one agency, it is done collaboratively.

Policies 29 and 51 in the RPS specifically direct the use of the precautionary approach to development in areas at high risk from natural hazards. Policy 47 directs the use of the precautionary approach when assessing the potential for adverse effects on indigenous ecosystems and habitats, where these ecosystems and habitats have not been fully addressed in regional and district plans.

Policies 61, 62 and 63 clarify the allocation of responsibility for section 30 functions of the RMA that are shared by WRC and the region's city and district councils. Policy 61 is specific to the control of the use of land for maintaining and enhancing indigenous biodiversity. Policy 62 is specific to the avoidance or mitigation of natural hazards, and Policy 63 is specific to preventing or mitigating any adverse effects of the storage, use, disposal, or transportation of hazardous substances.

Policy 61 clarifies that WRC is responsible for controlling the use of land to maintain and enhance ecosystems in water bodies and coastal water. This includes land within the coastal marine area, wetlands and beds of lakes and rivers. City and district councils are responsible for the control of the use of land for the maintenance of indigenous biodiversity other than within the coastal marine area and the beds of lakes and rivers. WRC and city and district councils each have responsibilities within wetlands.

Policy 62 clarifies that WRC is responsible for the control of land use for the avoidance or mitigation of natural hazards in the coastal marine area and the beds of lakes and rivers. WRC shares the responsibility for developing objectives, policies and other methods with district and city councils in other areas. Only the city and district councils are responsible for developing land use rules for hazards in areas other than in the coastal marine area and the beds of lakes and rivers.

Policy 63 clarifies that land use controls for hazardous substances in the coastal marine area and the beds of lakes and rivers is the responsibility of WRC. Land use controls for hazardous substances in other areas are the responsibility of city and district councils.

4. Operative regional freshwater, soil, discharges to land and coastal plans

The operative regional plans contain a variety of policies that recognise the need for integrated management of natural and physical resources. For example, the operative Plan for Discharges to Land for the Wellington Region recognises the interconnection between land and water through policies that

require consideration of the adverse effects from discharges to land entering groundwater, surface water or coastal water.>`

In the operative Regional Soil Plan for the Wellington Region, Policy 4.2.12 seeks to ensure that territorial authorities manage subdivisions to avoid, remedy or mitigate adverse effects on water quality. Policies 4.2.13 and 4.2.16 seek to manage soil disturbance activities in relation to potential adverse effects on the receiving environments.

Regional coastal plans are required to be approved by the Minister of Conservation. The operative Regional Coastal Plan for the Wellington Region (Coastal Plan) contains several policies that specifically address cooperation or collaboration, including Policies 4.2.28, 4.2.30, 4.2.34 and 4.2.42.

In the Coastal Plan, Policy 4.2.5 addresses the precautionary approach.

In the operative Regional Freshwater Plan for the Wellington Region (Freshwater Plan), Policies 4.2.10, 4.2.12 and 4.2.15 consider the adverse effects of subdivision, use and development on fresh water. Policy 4.2.14 considers the adverse effects of flows and water levels on trout habitat. Policy 4.2.30 requires cooperative working relationships with other agencies and tangata whenua to achieve integrated management.

The Freshwater Plan also addresses land-use effects on water quality and quantity under the section on cross-boundary issues. The explanatory text in section 12.1.3 of the plan is clear that the Freshwater Plan does not make rules directly relating to the use of land and the explanation to the policy notes that in this context, ‘promote’ does not include making rules directly relating to the use of land:

land use effects on water quality and quantity are raised in Issues 2.5.3, 2.5.4 and 2.6.5. The approach of the Council is to avoid, remedy, or mitigate the adverse effects of land use activities by promoting actions by other agencies and be people to maintain and enhance water quality and to maintain water quantity.

Note that in the proposed Plan, the control of land is not considered to be a “cross-boundary issue”. In the proposed Plan, the control of land is addressed as a required function under section 30(1)(c) of the RMA. Therefore, whereas the operative Freshwater Plan does not make rules directly relating to the use of land, the proposed Plan does.

The Freshwater Plan has three separate policies that refer to the precautionary approach. Policy 4.2.22 directs the use of the precautionary approach to flood management, Policy 4.2.25 directs the use of the precautionary approach to the management of fresh water. Policy 6.2.3 addresses the use of the precautionary approach for water allocation.

Overall, while the operative regional plans include the intent of integrated catchment management as a desirable outcome, the use of five separate plans with little mechanism to coordinate between them is neither effective nor

efficient. There is also a lack of provisions, particularly regulatory, that control land use activities that impact water quality.

The proposed Plan provides an opportunity for improved integration of land and water resource management much beyond what the operative regional plans have achieved. Retaining the approach in the operative plans is not the most appropriate way to achieve the purpose of the RMA and the integrated management of the region's natural and physical resources.

5. Appropriateness of the objectives

Section 32(1)(a) of the RMA requires that an evaluation report must “examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the Act”.

In order to evaluate the appropriateness of the proposed objectives, four standard criteria are used in this report:

- *Relevance* – is the objective related to addressing resource management issues? Will it achieve one or more aspects of the purpose and principles of the RMA?
- *Usefulness* – will the objective guide decision-making? Does it meet sound principles for writing objectives?
- *Reasonableness* – what is the extent of the regulatory impact imposed on individuals, businesses or the wider community?
- *Achievability* – can the objective be achieved with tools and resources available, or likely to be available, to WRC?

A brief description of the three key proposed objectives associated with ki uta ki tai is provided below. The three key proposed objectives are Objectives O1, O4 and O5.

Tables A1, A2 and A3 in the Appendix provide evaluations of the appropriateness of the proposed objectives against the four criteria.

5.1 Objective O1: Ki uta ki tai

Land, freshwater bodies and the coast are managed as integrated and connected resources; ki uta ki tai – mountains to the sea.

The principle of ki uta ki tai, from the mountains to the sea, recognises the interconnections between surface water and groundwater, between land use and water quality, between water quantity and water quality, and between fresh water and the coast. As part of this, the idea of integrated catchment management requires that a catchment area be used as the spatial unit for decision-making and implementation. Managing natural resources in an integrated manner also requires decision-making to be based on the best available information. Since natural processes are dynamic this requires management to be adaptive.

Proposed Objective O1 is relevant as it specifically addresses a key component of several resource management issues identified by iwi, the community and stakeholders during the development of the proposed Plan. In addition, this objective gives clear direction for the implementation of the NPS-FM, the NZCPS and the RPS.

The objective is a clearly written statement that will be achieved, in part, through the variations and plan changes recommended by the five whitua committees.

As shown in Table A1 in the Appendix, this objective is appropriate for achieving the purpose of the RMA.

5.2 Objective O4: Intrinsic values

The intrinsic values of aquatic ecosystems and the life-supporting capacity of water are recognised.

The intrinsic values of aquatic ecosystems are the aspects (and their constituent parts) which have value in their own right – independent of the value they might have for people and communities. As defined in the RMA (section 2), intrinsic values include biological and genetic diversity; and the essential characteristics that determine an ecosystem’s integrity, form, functioning and resilience. Safeguarding the life-supporting capacity of water is at the heart of the RMA – being part of the meaning of sustainable management (section 5(2)).

The proposed Objective O4 is relevant as it directly addresses sustainable management in the RMA and the particular regard to be given to intrinsic values under section 7(d). The objective also addresses a key resource management issue of the degradation of ecosystem health and function. In addition, this objective will assist in the implementation of the NPS-FM and the RPS.

The objective is a clearly written statement that will be achieved over a long time frame, and through the variations and plan changes recommended by the five whitua committees.

As shown in Table A2 in the Appendix, this objective is appropriate for achieving the purpose of the RMA.

5.3 Objective O5: Fresh and coastal water

Freshwater bodies and the coastal marine area, as a minimum, are managed to:

- (a) safeguard aquatic ecosystem health and mahinga kai, and*
- (b) provide for contact recreation and Māori customary use, and*
- (c) in the case of fresh water, provide for the health needs of people.*

The proposed Objective O5 defines the minimum outcomes for the management of natural and physical resources in the Wellington Region. It does not preclude them from being managed for other values or uses.

The objective is broad and overarching, under which falls much of the plan's approach to managing land use and fresh and coastal water. In particular, Objective O5 provides an overarching direction to proposed Objectives O23, O24 and O25. This suite of proposed objectives is discussed in more detail in the report entitled, "Section 32 report: Water quality".

Objective O5 aims to improve integration both within and between catchments and whitua. This is achieved by establishing a set of minimum, common values for managing fresh and coastal waters within and between hydrological catchments or whitua.

Objective O5 is appropriate because it takes direction from the NPS-FM, RPS and the extensive community engagement process that was implemented at the outset of the plan review.

In combination with objectives related to specific management outcomes for water and land resources, including catchment-specific outcomes from the whitua committee process, this objective will assist in guiding effective decision-making.

As shown in Table A3 in the Appendix, this objective is appropriate for achieving the purpose of the RMA.

6. Efficiency and effectiveness of the policies and methods

An assessment of the efficiency and effectiveness of the proposed policies, rules and methods used to implement the three objectives for ki uta ki tai are provided below.

The proposed policies and methods are assessed in accordance with sections 32(1)(b) and 32(2) of the RMA as to whether they are the most appropriate way to achieve the objectives in the proposed Plan.

As mentioned in the introduction to this report, the concept of ki uta ki tai is integral to the framework of the provisions in the proposed Plan. Therefore the assessment of relevant provisions in the proposed Plan is contained within a suite of section 32 reports, which should be read in conjunction with this report.

The provisions assessed in this report and in Table A4 in the Appendix are specific to the principles of ki uta ki tai, cross-boundary matters, the precautionary approach, reviewing consents in respect to future changes to the Plan, and granting consents with common expiry (synchronised expiry) or review dates.

Table 2 below lists the policies and methods in the proposed Plan relevant to achieving Objectives O1, O4 and O5.

Table 2: Provisions relevant achieving Objectives O 1, O 4 and O5

Objectives:	Objective O1: Ki uta ki tai Objective O4: Intrinsic values Objective O5: Fresh and coastal waters
Policies:	Policy P1: Ki uta ki tai and integrated catchment management Policy P2: Cross-boundary matters Policy P3: Precautionary approach Policy P5: Review of existing consents Policy P6: Synchronised expiry and review dates
Methods:	Method M3: Wellington regional hazards management strategy Method M6: NPS-FM strategy Method M8: Te Awarua-o-Porirua Harbour restoration Method M9: Wairarapa Moana Method M10: Water quality investigations and remediation actions Method M11: Assessment and reporting of Wellington Regional Council works, operations and services for integrated catchment management Method M12: Sustainable land management practices Method M15: Regional stormwater working group Method M18: Water use groups Method M22: Integrated management of the coast

6.1 Ki uta ki tai and integrated catchment management

As discussed in section 4 of this report, and outlined in Table A4 in the Appendix, the status quo in the operative regional plans does not deliver integrated catchment management in an efficient and effective manner.

Proposed Policy P1 specifically addresses the principles of ki uta ki tai and integrated catchment management. It provides a list of the principles to guide decision-making for all of the provisions relevant to ki uta ki tai. These principles will assist in the achievement of Objectives O1, O4 and O5. In addition, integrated catchment management is directed by a wide a range of proposed policies, rules and methods specific to water quality, water takes, discharges to land and rural land-use activities, which are discussed in other section 32 reports.

The principles of integrated catchment management listed in Policy P1 focus on processes to achieve sustainable resource management. These include the use of the catchment as the appropriate spatial unit for decision-making, the use of adaptive management, coordinated data collection, and recognition of connections and interrelationships.

As indicated in Table 2 above, this policy will be implemented primarily through non-regulatory methods. In addition, recommendations from the whitua committees will be translated, in part, into plan changes and variations into the whitua-specific chapters (see section 2.3 of this report). Whitua-specific plan changes will be accompanied by section 32 reports that evaluate the appropriateness of the proposed provisions.

There are several proposed methods to assist in the implementation of Policy P1. These methods include catchment-specific programmes for the restoration of Te Awarua-o-Porirua Harbour (Method M8) and Wairarapa Moana (Method M9). Proposed Method M11 (Assessment and reporting of Wellington Regional Council works, operations and services for integrated catchment management) and Method M22 (Integrated management of the coast) focus on the coordination of information within and amongst agencies. Method M18 (Water use groups) focuses on coordination of information amongst resource users. Proposed Method M10 (Water quality investigations and remediation actions) and M12 (Sustainable land management practices) rely on a combination of site-specific and catchment-level investigations to implement Policy P1.

Implementation of integrated catchment management will require a change in the way WRC manages internal data collection, analysis and reporting. This may result in costs to change and improve systems. However, these initial changes are anticipated to result in cost savings over the longer term as integrated management and outcomes are improved.

6.2 Cross-boundary matters

Cross-boundary matters can occur when the effects of activities impact on components of the environment under the jurisdiction of another authority. Of specific concern is the relationship between regional councils and territorial authorities, as to their respective roles under the RMA. There are a number of cross-boundary issues that arise in this regard. For example, land-use activities administered by territorial authorities often result in discharges to air or water which are controlled by regional authorities. Integrated management of these activities requires coordination between the relevant authorities.

Within the Wellington Region, the following nine city and district councils have jurisdiction in performing the functions of territorial authorities, under the RMA:

- Kāpiti Coast District Council
- Porirua City Council
- Wellington City Council
- Lower Hutt City Council
- Upper Hutt City Council
- South Wairarapa District Council
- Carterton District Council
- Masterton District Council
- A small part of Tararua District is also in the region

The Wellington Region also shares boundaries with Horowhenua District Council, Horizons Regional Council and Marlborough District Council.

WRC and the region's district and city councils share some functions in accordance with section 30 of the RMA. This is for the control of the use of land for the avoidance or mitigation of natural hazards; maintaining and enhancing indigenous biodiversity; and preventing or mitigating any adverse effects of the storage, use, disposal, or transportation of hazardous substances. The responsibilities for these shared functions are directed by RPS Policies 61, 62 and 63, as discussed in section 3.2.1 of this report.

Proposed Policy P2 provides guidance to decision-makers in the event that an activity requiring resource consent crosses jurisdictional boundaries. The policy requires particular regard be given to relevant provisions in bordering territorial authorities proposed and/or operative plans.

Proposed Policy P2 specifically mentions activities that span mean high water springs or the beds of lakes and rivers. It is anticipated that proposed Policy P2 will also need to be considered for applications that could result in impacts on natural character and public access.

The proposed policy will also be implemented through proposed rules for permitted activities that are consistent with rules in territorial authorities' district plans. This will add to the efficiency of the proposed Plan by providing more consistency for the community and resource users.

The proposed policy will also be implemented also through several non-regulatory "Other methods" that rely on cross-council partnership and collaboration. Many of these methods are listed in Table 2 above. The use of cross-council programmes should result in increased effectiveness of achieving ki uta ki tai – the principles of which include coordinated management and recognition of the links between environmental, social, cultural and economic sustainability.

6.3 Precautionary approach

As noted in section 3.1 of this report, when considering an application for resource consent, WRC must have regard to any other matter that is relevant and reasonable necessary to determine an application for resource consent in accordance with section 104(1)(c) of the RMA. This "other matter" often includes matters of risk, uncertainty and the precautionary principle.

Proposed Policy P3 gives clear direction that the precautionary principle shall be used for consent applications where there is limited information on the receiving environment and the potential adverse effects of the activity on that environment.

The proposed policy would replace several policies in the operative plans, so will be more efficient, and function in a more integrated manner for the entire proposed Plan.

If the proposed Plan did not include this policy, the precautionary principle could still be addressed under RMA section 104. The inclusion of the proposed policy is preferred as it provides clarity to the consent applicant and the community that the precautionary approach will be used in decision-making. In this way, the proposed policy is an effective way to communicate the intent of WRC to plan users.

The use of the precautionary approach can result in considerable cost to the resource user. As noted in a think piece on provisions in the RMA, the precautionary approach may result in an application for resource consent being declined or granted for a short duration and with strict conditions in conjunction with increased monitoring and research (Milne 2008).

However, given that the proposed policy replaces several operative policies, there are no anticipated changes to the costs or benefits of implementing this provision. Proposed Policy P2 is a more effective and efficient way to communicate the intent of WRC to adopt a precautionary approach than having no policy on the matter, or the provisions in the operative plans.

6.4 Consent review under section 128(b)

Policy P5 in the proposed Plan directs that resource consents for discharges and water takes may be reviewed pursuant to section 128 of the RMA. Consent reviews are used to review and modify the conditions of consent. The ability of WRC to review consent conditions is guided and restricted by section 128. Policy P5 is specific to the requirements under section 128(b), and as such proposed Policy P5 gives clear direction on how plan changes to whaitua-specific provisions may affect existing consents.

Consent reviews are guided by sections 128 and 129 of the RMA. Consent reviews are used infrequently by councils. This is largely because section 128 specifies a very narrow set of circumstances in which the conditions of consent may be reviewed. A review under section 128(a) must be limited to a purpose specified in a consent condition.

Section 128(b) states that consent conditions for coastal, water or discharge permits can be reviewed when a plan is made operative which sets rules relating to water levels, flows or rates of water use, or minimum standards of water quality. This section of the RMA was amended in 2009. This will be particularly relevant when variations and plan changes are proposed as a result of whaitua implementation plans. Proposed Policy P5 provides direction that specifically acknowledges these circumstances.

Reviews can also occur under section 128(c) when the information provided by the applicant with the original resource consent application contained inaccuracies that materially influenced the outcome of the decision on the resource consent. This circumstance has never been encountered by WRC.

Future plan changes or variations which incorporate whaitua-specific provisions into the proposed Plan increase the likelihood for the reviews under section 128(b) being invoked. It is important to note that the majority of the

costs of consent reviews are likely to be borne by WRC rather than the consent holder.

Section 36(1)(cb) of the RMA does not provide for charging for reviews under section 128(b). As noted on the Quality Planning website (Quality Planning 2013), because reviews under section 128(b) are not initiated by the consent holder, but by the consenting authority, and it is unlikely that the outcome of the review will be of more benefit to the consent holder compared to the community as a whole. Consequently, councils should bear the cost of such reviews.

Therefore, although Policy P5 assists in the implementation of consent reviews to manage the adverse effects associated with catchment-scale over-allocations, the costs of completing these reviews would be borne by WRC and ultimately the community rather than by the consent or permit holder.

Policy P5 anticipates that consent reviews can be used to implement whaitua-specific limits once they are made operative in the Plan. However, in addition to the costs mentioned above, any decision that would restrict the ability of a consent holder to fully exercise their consent part-way through its term needs to consider section 131(1)(a) of the RMA. This section requires regard to be given to the matters in section 104 of the RMA and to whether the activity allowed by the consent will continue to be viable after the change, given that a consent review would generally not have the scope to “cancel” a resource consent. These complexities, among others, have led Milne (2008) to call consent reviews a “tool of last resort”.

There is relatively little risk of adverse environmental effects if this proposed policy was not included in the proposed Plan, given that WRC could still initiate consent reviews under section 128(b) without explicit direction in a policy. However, the inclusion of the proposed policy provides clarity to consent holders and the community of WRC’s intent. Where a variation or plan change related to water quality or quantity limits is anticipated, WRC can also include a consent condition advising the consent or permit holder that these could trigger a review of the consent or permit.

6.5 Grant of consents with common expiry or review dates

Policy P6 provides for resource consents to take and use water to be granted with a common expiry or review date. This allows catchment-scale cumulative effects of multiple resource use activities to be considered and assessed in an integrated manner. This policy is key in delivering ki uta ki tai and integrated catchment management.

The use of consent reviews that are triggered by limits being adopted as a result of a variation or plan change is discussed in section 6.4 in this report. Proposed Policy P6 refers to consent reviews for the purpose of enabling an integrated approach under the water allocation and water quality provisions as set out in the proposed Plan. Additional discussion on the framework for the take and use of water is provided in the report entitled, “Section 32 report: Water quantity”. The report entitled, “Section 32 report: Water quality”, provides information on the relevant water quality provisions.

Regarding the use of common expiry dates, this practice is currently used within sub-catchments for most water takes in the Wellington Region (GWRC 2011). This is also a common practice throughout New Zealand as determined through a 1999 MfE survey (presented in van Voorhuysen and Cameron 2000), which indicated that two-thirds of regional councils assign a common expiry date to water take and discharge consents within a single catchment.

There can be considerable costs for some resource users associated with the use of common expiry. This cost occurs when a consent application is decided on close the date of common expiry. In this instance, whilst other consent holders in the catchment or sub-catchment may have enjoyed a consent with a relatively long duration, the new application would be granted a shorter duration, if there was a common expiry date.

There can also be considerable costs for WRC when many applications come up for renewal at the same time, resulting in many applications needing to be assessed and decided on within the same time frame.

Provisions for integrated catchment management will also result in financial benefits, including those associated with increased certainty and transparency.

6.6 Summary

The requirements of the RMA, NPS-FM, NZCPS and the RPS to manage natural resources in an integrated manner are clear. As summarised in section 4 of this report and Table A4 in the Appendix, provisions in the operative plans would not give effect to these requirements.

Not including specific provisions in the proposed Plan to guide ki uta ki tai would result in an unacceptable risk that WRC would not meet its statutory obligations.

Therefore, the policies and methods in Table 2 are the preferred and most effective and efficient means of giving effect to the proposed objectives, the statutory instruments, and the purpose of the RMA.

References

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Appendix

Table A1: Assessing the appropriateness of Objective O1: Ki uta ki tai

Objective O1 Land, freshwater bodies and the coast are managed as integrated and connected resources and by ki uta ki tai – mountains to the sea.	
Relevance	
Directly related to resource management issue?	Yes, this objective addresses a range of issues that refer to the principles of integrated catchment management (GWRC 2014).
Will achieve one or more aspects of the purpose and principles of the RMA?	Yes, integrated management will help achieve all aspects of Part 2 (purpose and principles) of the RMA.
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes, integrated management and ki uta ki tai requires a collaborative approach which is relevant to the management of issues relevant to Māori.
Relevant to statutory functions or to give effect to another plan or policy (e.g. section 30, and any relevant NPS, NES, NZCPS, RPS)?	The objective of integrated catchment management is integral to the NPS-FM. The implementation guide for the NPS-FM notes that the importance of integration is supported by provisions of the RMA, including sections 30(1)(a),(c) and (g) and 59. The NZCPS requires integrated catchment management, specifically in Policies 4, 21, 22 and 23. The objective gives effect to Policies 12, 18 and 49 of the RPS.
Usefulness	
Will effectively guide decision-making?	Yes. Linking the objective to a policy on integrated catchment management and the implementation of the whatua committee process will result in limits and allocations.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	This objective is a clear and complete sentence related to an issue. This objective is not time-bound as it aims to deliver benefits over time.
Consistent with other objectives?	Yes, all the objectives will work together to achieve the sustainable management of natural resources in the Wellington Region.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	Yes, the objective will be achieved when limits and allocations are put into the proposed Plan through plan changes.

Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	The objective, under the requirements of the NPS-FM, does not need to be implemented until 2025.
Does WRC have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	Section 30(1)(a) of the RMA gives WRC the functions of establishing, implementing and reviewing objectives, policies and methods to achieve integrated management.
What other parties can the Council realistically expect to influence to contribute to this outcome?	Some powers are reserved for the territorial authorities. Integrated catchment management will require collaboration with territorial authorities.
What risks have been identified in respect of outcomes?	Integrated land and water management is a complex multi-faceted, collaborative exercise involving many people, groups and agencies. These are risks inherent in a process that relies on both regulatory (NPS-FM) and non-regulatory outcomes working together.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	The social, environmental and economic benefits of integrated land and water management will have greater benefits than costs.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Ratepayers. The implications are improved environmental management.
Existing objectives	
Are the existing objectives still relevant or useful?	No. Provisions in the operative land, soil and freshwater plans do not specifically manage for integrated management or ki uta ki tai. The coastal plan does address integrated management, but not within the whole catchment or up to the mountains.

Table A2: Assessing the appropriateness of Objective O4: Intrinsic values

Objective O4	
The intrinsic values of aquatic ecosystems and the life-supporting capacity of water are recognised	
Relevance	
Directly related to resource management issue?	Yes, Issue 4.1
Will achieve one or more aspects of the purpose and principles of the RMA?	Section 5 and section 7(d) of the RMA.
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes intrinsic values of aquatic ecosystems and the life supporting capacity of water are linked to the mauri of coastal and fresh water.
Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS-FM, RPS)?	Gives effect to Objective A1, B1 and C1 of the NPS-FM and Objective 13 and Policies 12 and 18 of the RPS.
Usefulness	
Will effectively guide decision-making?	Establishes a clear environmental outcomes for fresh water against which activities can be assessed.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	States what is to be achieved.
Consistent with other objectives?	Yes.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	The objective is ongoing in nature. Its achievement can be measured on a case-by-case basis and against the achievement of more overarching freshwater objectives.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	This is a longer-term objective.
Does WRC have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	The WRC has the jurisdiction under the RMA to ensure that the purpose of the RMA is achieved and to have regard to the intrinsic values of ecosystems.
What other parties can the Council realistically expect to influence to contribute to this outcome?	The whaitua committees will be critical to ensuring the delivery of this objective on a catchment level. Resource users and developers will also contribute to the outcomes sought by the objective.

What risks have been identified in respect of outcomes?	Establishing specifically the intrinsic value and life-supporting capacity of water for all water bodies in the region.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	This objective has greater environmental and social benefits compared to the costs necessary to achieve it.
Who is likely to be most affected by achieving the objective and what are the implications for them?	All users and consumers of freshwater resources will be affected by this objective.
Existing objectives	
Are the existing objectives still relevant or useful?	The existing objectives are not sufficient to give effect to the RMA, NZCPS, NPS-FM and RPS.

Table A3: Assessing the appropriateness of Objective O5: Fresh and coastal waters

Objective O5 Freshwater bodies and the coastal marine area, as a minimum, are managed to: (a) safeguard aquatic ecosystem health and mahinga kai, and (b) provide for contact recreation and Māori customary use, and (c) in the case of fresh water, provide for the health needs of people.	
Relevance	
Directly related to resource management issue?	Yes, this objective relates to Issues 1.1, 4.1, 4.3, 6.1 and 6.3
Will achieve one or more aspects of the purpose and principles of the RMA?	Yes, Part 2, sections 5(2)(a), 5(2)(b), 6(e), 6(g) and 7(d)
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes, particularly 6(e), 7(aa) and 8
Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS-FM, RPS)?	Yes, RMA section 30 NZCPS Objective 1 and 3 NPS-FM Objective A1 and B1 RPS Objectives 6, 12, 13 and 27 and Policies 5, 12, 13, 17, 18 and 49

Usefulness	
Will effectively guide decision-making?	This objective will guide the processing of resource consents as well as guiding the whaitua committee decision-making process.
Meets sound principles for writing objectives?	The objective is a clear and complete sentence relating to an issue. This objective is not time bound or specific about how it may be achieved, but this is appropriate given that it is a high-level, strategic objective which is given effect to in many more specific ways throughout the proposed Plan and the whaitua committee process.
Consistent with other objectives?	Yes, all the objectives have been assessed and work together to achieve the sustainable management of natural resources in the Wellington Region. In particular, this objective works in combination with Objectives O23, O24 and O25.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measureable and how would its achievement be measured?	Yes, the achievement of this objective will be clear in the future through monitoring, particularly in connection with O14 and O20.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	This objective will be achieved during the plan (in some water bodies and with regard to specific consented processes) and into the future.
Does WRC have the functions, powers, and policy tools to ensure that they can be achieved?	Yes, section 9, 12, 13, 14 and 15 are all relevant. This objective will be achieved through the policies, rules and other methods in this plan.
What other parties can WRC realistically expect to influence to contribute to this outcome?	All resource users, including territorial authorities, government departments, mana whenua, landowners and water users.
What risks have been identified in respect of outcomes?	The risk to water quality and ecosystem health will be reduced through the achievement of this objective.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	Yes, this objective will have greater environmental benefits than the costs necessary to achieve it. Some of the costs that may be necessary to implement systems, such as limits and allocation frameworks, to achieve the objective will be developed and implemented via the whaitua committee process and will be fully assessed when these are developed.
Who is likely to be most affected by achieving the objective and what are the implications for them?	As a very broad objective, O5 will affect the region's land and water users.

Existing objectives	
Are the existing objectives still relevant or useful?	The existing objectives are not fully relevant to the requirements of the NPS-FM, NZCPS and RPS.

Table A4 below is specific to an assessment of policies and methods for achieving the objectives for ki uta ki tai, intrinsic values, and fresh and coastal water, which regard to the principles of ki uta ki tai, cross-boundary matters, precautionary approach, and reviewing and synchronising resource consents.

Table A4: Efficiency and effectiveness of policies and methods for achieving the objectives

		Status quo (no change from operative plans)	Proposed provisions (preferred approach)
Costs	WRC	The operative plans lack policies that assist in giving effect to the NPS-FM, which is an unacceptable cost to WRC.	Implementation of integrated catchment management will require a change in data collection, analysis and reporting. This may result in additional set-up costs although it should result in cost savings as integrated management and outcomes are improved. WRC currently seeks to use common review and expiry dates for water take permits and most consents already use a condition that ties review in with anticipated plan changes, therefore the costs associated with common review and expiry dates are likely to be neutral.
	Resource user	Although the operative plans lack specific policies regarding common expiry dates, consents for water takes, in general, they are processed to have common expiry dates and review conditions tied to plan changes. This can result in costs to some applicants if consent is granted for a shorter term than desired.	The improved consideration of cumulative effects could result in increased costs for some applications for consent. Common expiry dates can result in costs to some applicants if consent is granted for a shorter term than desired.
	Community costs	The lack of specific policies that assist giving effect to the requirements of integrated catchment management in the NPS-FM can result in over-allocation and adverse effects on the environment.	Any additional costs to WRC to improve data collection and analysis could be passed on to rate-payers.

		Status quo (no change from operative plans)	Proposed provisions (preferred approach)
Benefits	WRC	No benefits.	Improved integration of data collection, analysis and reporting using the principles of integrated catchment management will benefit WRC's value to the community and resource users. The NPS-FM is given effect to.
	Resource user	No benefits.	Review and synchronisation of all consents in a catchment at the same time will ensure certainty and transparency in the application of limits to all resource users.
	Community benefits	No benefits.	Environmental benefits of sustainable management Improved intrinsic values, ecosystem health and mahinga kai, contact recreation and Māori customary use and public health needs of people
Efficiency (costs vs benefits) and effectiveness		The lack of integration amongst the operative plans results in inefficient use of and ineffective integrated catchment management.	Specific direction on the principles of integrated catchment management and the precautionary approach will increase efficiency and effectiveness. Guidance on cross-boundary matters, consent reviews and common expiry dates are similar to those in the operational plans, but their integration into one plan should increase efficiency.
Risks (of acting or not acting)		Not acting would result in the risk of not giving effect to the RMA, NPS-FM, NZCPS and RPS.	
Appropriateness		This option is not appropriate.	This option is appropriate because the benefits of new provisions outweigh the costs and it is the most efficient and effective means to achieve the objectives associated with ki uta ki tai.
Conclusions		Provisions in the proposed Plan are the most appropriate.	