

# SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE [WWW.FEDFARM.ORG.NZ](http://WWW.FEDFARM.ORG.NZ)



To: Wellington Regional Council  
PO Box 11646,  
Manners St,  
Wellington 6142.

Submission on: **Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region pursuant to Clause 6 and Part 4 of Schedule 1 of the Resource Management Act 1991 (includes Freshwater Planning Instrument)**

Date: 15 December 2023

Submission by: Wairarapa Federated Farmers.

**David Hayes**  
WAIRARAPA PROVINCIAL PRESIDENT  
Federated Farmers of New Zealand

Address for service: **Elizabeth McGruddy**  
SENIOR POLICY ADVISOR  
Federated Farmers of New Zealand  
PO Box 715, Wellington 6140  
P 0800 327 646  
E [emcgruddy@fedfarm.org.nz](mailto:emcgruddy@fedfarm.org.nz)

---

## Introduction

1. Wairarapa Federated Farmers welcomes the opportunity to submit on Proposed Plan Change 1 (PC1) to the Wellington Region Natural Resources Plan (NRP). Our submission is made up of two parts – this PDF document and an attached Excel submission table. In considering our submission, please ensure both parts are read in their entirety.
2. Federated Farmers supports progressive improvement towards the health and well-being of waterbodies in Te Awarua-o-Porirua Whaitua and Whaitua Te Whanganui-a-Tara (the whaitua). We acknowledge the work of the two whaitua committees over many years to develop the objectives and recommendations for freshwater across the whaitua. We also acknowledge the work undertaken by Wellington Regional Council (the Council) to support improvements to water quality at a catchment level, working with communities and targeting specific actions that are known to ‘make a difference’.
3. Federated Farmers generally agree with the long-term overarching objectives for both whaitua. We believe that 2100 is a realistic timeframe for those objectives, as many of the desired target attribute states (TASs) will take multiple generations and much planning and investment to achieve.
4. We support an interim timeframe of 2040 to ‘check in’ and see whether water quality is on a trajectory of improvement. However, we don’t believe that all TASs will be able to be achieved by 2040, which is just 17 years away. In part this is because there is currently a lack of quality data to establish baseline positions for all TASs. More work needs to be done to gather and collate this data so it can be used to inform the freshwater action plans (FAPs) that will set out the pathway to achieving the TASs.
5. Quality data is also needed to inform models that are free of uncertainty and error to the extent that they can be used to underpin policies that drive system change. Federated Farmers is concerned that model outputs used for PC1 of the NRP are inadequate for this purpose. Any model is only as good as the quality of data used for inputs and must be ground-truthed. We don’t believe that there has been sufficient effort put into ground-truthing the modelled data for PC1, and this should be a focus for the Council before some policies and rules can be proposed.
6. Federated Farmers is concerned to see ‘blanket’ policies and rules proposed that will be implemented at property level with severe implications for rural landowners, including requiring them to retire certain classes of land from pastoral and plantation forestry use and undertake expensive riparian management measures. We don’t believe there is clear unequivocal evidence that supports these policies and rules, and/or that the proposed policies and rules will get us any closer to achieving the TASs.

7. The direct and opportunity costs of some of the proposed policies and rules are too high for rural landowners and amount to a form of ‘managed retreat’ for public good, with no compensation.
8. Federated Farmers contends that there is a better way forward. Council can be an “exemplar” on its own land and to other regional councils across New Zealand on partnering with landowners and rural communities to get serious about the smart data needed to inform best bang-for-buck policies that will enable it to achieve the long-term objectives.
9. Federated Farmers support an integrated catchment approach to the management of sediment and nutrient loss, supported in tangible ways by the Council and underpinned by non-regulatory methods such as FAPs and a Regional Forest Spatial Plan. We believe this approach provides an opportunity for the Council to demonstrate best practice in terms of management and protection of natural ecosystems including freshwater ecosystems.
10. Below we present our views on specific parts PC1 of the NRP (organised by topic). Our recommended relief is set out in the Excel table. We request that the Council make any consequential amendment(s) necessary to give effect to the relief sought by Wairarapa Federated Farmers.
11. At date of finalising this submission we are still waiting to receive information requested from Council. The information is potentially material to our relief and we propose including material received after the submission deadline in the upcoming hearings.

## Target Attribute States and Timeframes

12. The overarching objectives in chapters 8 (WH.O1) and 9 (P.O1) are that waterbodies in the two whitua will be wai ora by 2100. Objectives WH.O1 and P.O1 intend that the health of water bodies from now until 2100 should improve “progressively” to reach wai ora. Federated Farmers generally agrees with these overarching objectives, although we would like to see them include provision for a thriving primary production sector.
13. Objectives WH.O2 and P.O2 are clear that there will be a trajectory of measurable improvement towards the health and well-being of waterbodies and their margins in the whitua, such that by 2040, listed processes or states in relation to freshwater have improved or have been reached. These objectives recognise that the enormous amount of system change needed to meet the overarching objectives of WH.O1 and P.O1 will take time (i.e. generations), knowledge that might not yet be available and significant financial investment to achieve.
14. Progress towards the overarching objectives will be measured by meeting proposed TASs and coastal water objectives. The Council has set out TASs that must be met by 2040 in Tables 8.4 and 9.2 of PC1, i.e. within the next 17 years.

15. Federated Farmers considers 2040 to be an unrealistic timeframe to meet all the proposed TASs. The notes in Tables 8.4 and 9.2 alone indicate that the Council has insufficient data on baseline states for some attributes and that further monitoring and modelling is required to develop attribute state frameworks. Further work is also required by the Council, with mana whenua and communities, to develop and implement a large number of FAPs to address how TASs will be achieved. This whole body of work will likely take time to establish a robust body of evidence for the TAS baselines, and the plans on how to achieve TASs where they need to be improved.
16. Federated Farmers supports progressive improvement towards the health and well-being of waterbodies in the two whaitua, but we think a requirement to achieve all the TASs by 2040 is unrealistic. Federated Farmers seeks that the reference to 2040 be removed from Tables 8.4 and 9.2. We believe where the TASs are already met, they should be maintained (this is a requirement under the NPS-FM in any case). Where they need to be improved, the tables should reflect realistic dates by which the TASs can be achieved.
17. Milestone target dates do not have to be the same for all TASs and all part FMUs. The Council has an opportunity to prioritise part-FMUs where it can achieve the 'easiest wins' (perhaps, for example, because work is already underway, or cessation of a single point source discharge could improve water quality dramatically) or where human health is most likely to be impacted by poor water quality. Realistic timeframes can be determined through the process of preparing FAPs and brought into a future version of the NRP through a variation.
18. Federated Farmers seeks relief that TAS's and/or sites where there is limited or 'insufficient data' should be removed from Tables 8.4 and 9.2 because the baseline state cannot be reliably determined, and therefore it is not known whether the attribute and/or site needs to be maintained or improved.

## Management of Sediment

### Sediment from land disturbances (earthworks and vegetation clearance)

19. The earthworks and vegetation clearance rules in the operative NRP were discussed extensively and agreed through Environment Court assisted mediation. The rules in the operative plan have been in place for a very limited time and were a significant shift on the previous plan. Federated Farmers contends that it is too soon to start unravelling the positions agreed through mediation, and that the operative rules should remain, so that the changes can be given time to take effect.
20. The operative plan had a permitted activity rule and a controlled activity rule for construction of new farm tracks (Rule R102 and Rule R103), both of which have been removed from the proposed NRP. This means that the construction of farm tracks is proposed to be a restricted discretionary activity or non-complying activity if the conditions of the permitted activity rule cannot be met. We see no reason why the permitted activity rule and controlled activity rule for construction of farm tracks have been removed, especially as the conditions for both rules

were very prescriptive (and most probably very effective) in terms of managing environmental effects. Federated Farmers opposes the removal of these rules and seeks to have them reinstated.

21. Earthworks from 1 June to 30 September each year is no longer a permitted activity, irrespective of whether the effects of the earthworks can be managed to meet the discharge standards (unless it has been anticipated in a certified farm environment plan (FEP)). Earthworks over the winter months of the year will now require a consent, with the application to be assessed as a non-complying activity (meaning it will have to meet the 'Gateway' test of s 104D of the RMA). Federated Farmers is concerned to see the implementation of a draft 'blanket ban' on earthworks for four months of the year, especially as it reduces a farmer's ability to manage and operate their business without additional cost and administrative burden and respond to events in a timely manner. For example, storm events over the winter months can wash out farm tracks, meaning farmers might not be able to access stock or farm buildings or sometimes even their own dwelling. Farmers need the flexibility to be able to restore access without having to wait for a resource consent to be granted.
22. In summary, Federated Farmers oppose the earthworks and vegetation clearance policies and rules in the proposed NRP and seek relief that the policies and rules in the operative NRP remain.

### Sediment from pastoral farming

23. New maps for high and highest erosion risk land are proposed to be included in PC1 of the NRP. The Council considers that it is necessary to impose a policy that establishes permanent woody vegetation cover on at least 50% of highest erosion land (pasture) that is in pasture on a farm within 10 years and 100% by 2040 to meet TASs for sediment. The policy will apply to properties 20ha or more and will have the most impact in the Te Awa Kairangi rural streams and mainstreams FMU, and the Parangārehu catchment streams and south-west coast rural streams freshwater management unit (FMU).
24. Regarding modelling to identify highest erosion risk land (pasture) and high erosion risk land (pasture) we note the advice of Easton et al<sup>1</sup> that the mapped risk areas should not be used exclusively as the basis of management and investment decisions, and do not replace the need for site specific field assessment (i.e. ground-truthing) and expert advice. Easton et al also acknowledge other limitations with the modelling, including that underlying rock type has not been considered in the assessment of shallow landslide risk, nor have already-implemented erosion control measures such as established pole planting or sediment retention bunds been accounted for in the current iteration of the risk layers.
25. Federated Farmers has serious concerns about the erosion risk land modelling and how the Council intends to use it to underpin policies to retire land from pasture and plantation forest.

---

<sup>1</sup> Easton, S., Nation, T., Blyth, J. (2023) Erosion Risk Mapping for Te-Awarua-o-Porirua and Te Whanganui-a-Tara. Collaborations 15 pp.

We agree with Easton *et al* that site-specific assessments must be undertaken to ground-truth the model. Our members have told us that many areas of farms identified as being high or highest erosion risk land are stable and not erosion prone.

26. Federated Farmers considers that the policy to require the establishment of permanent woody vegetation cover on at least 50% of highest erosion land (pasture) that is in pasture on a farm within 10 years and 100% by 2040 to be overly onerous to landowners and extremely impractical to implement. This policy is essentially a policy of managed retreat to attain a public good by privatising the cost to individual property owners and is a major intrusion into private property rights.
27. The policy also creates an equity issue, as proposed policies and rules in urban areas of the whitua generally apply at a municipal level (that is, they don't directly impact individual households or businesses), and costs can be debt funded across multiple generations of ratepayers. In comparison, policies and rules proposed for rural areas of the whitua impact individual landowners with considerable costs being incurred within the next 17 years (i.e. less than one generation).
28. The policy might be palatable to some landowners if the timeframes were extended to a reasonable period and landowners were able to take advantage, in a voluntary capacity, of full compensation for areas of their land that would no longer be available for farming. It is noted that the policy prohibits even the establishment of production forestry on this land, further reducing options for economic use for landowners. The adoption of this policy will affect the on-farm income of landowners through the opportunity cost from foregone pasture production, and will also likely impact property values, making it harder for these properties to be sold and reducing their sale price.
29. Evans et al<sup>2</sup> explore the issue of compensation where changes to legislation or policies deprive members of society some right or freedom, such as the use of their property to provide for their economic well-being. They argue that *where a specific government decision or change in policy denies the owner of property the ability to make an economically viable use of that property in the use for which it was purchased, then this represents a de-facto taking [of private property rights] that requires compensation.*
30. Farmers will be required to pick up the costs of fencing, pre-planting preparation of land, purchase of seedstock, planting, watering, fertilising and weed and pest control. There are likely to be considerable challenges sourcing sufficient seedstock for planting and finding labour to plant native seedstock. A further challenge and cost is likely to be sourcing specialist advice to ensure new plantings occur in a way that is consistent with the Emissions Trading Scheme (ETS) eligibility criteria so as to avoid plantings being ineligible for New Zealand Units (NZUs).

---

<sup>2</sup> [Evans and Quigley - Protection of private property rights and just compensation - 27 Oct 2009 - Background Reading for the 2025 Taskforce - New Zealand \(treasury.govt.nz\)](#)

31. The policy mentions, rather vaguely, that WRC will provide “support” to landowners to implement erosion risk treatment plans. The level of support is not detailed, but if it is fair and comprehensive it is likely going to be costly for ratepayers. Federated Farmer’s view is that the support of landowners (i.e. financial compensation for the loss of production, the costs associated with planting land in permanent forest and ongoing maintenance of those areas) is of such importance that it deserves a policy that is explicit in the extent, timing and delivery of such assistance and includes a full buy-out option.
32. The Council states in the s32 report that the separation of highest erosion risk land and soil conservation treatment of high erosion risk land may provide for minor increases in productivity from the farm, as the more productive areas are separated from less productive areas, allowing for increased production on the better suited land. This argument has no rational basis and ignores the Council’s other policies which cap nutrient discharges from farming activities, effectively limiting any further intensification.
33. Federated Farmers acknowledges that the area (ha) of land within the highest erosion risk land map is relatively small across the two whitua; however, at a farm scale the areas are significant for some properties. We have heard from members who estimate they could lose at least a third of their property under this policy.
34. Federated Farmers oppose policies and rules that require the ‘blanket’ mandatory retirement of private land to manage potential sediment loss. We suggest an alternative approach that was discussed in Hearing Stream 3 - Climate Change: Climate Resilience and Nature-Based Solutions for Plan Change 1 to the Regional Policy Statement in June 2023. Specifically, that restoration and enhancement of the natural ecosystems is best achieved via non-regulatory incentives and support.
35. The 42A officer (Pam Guest) for Hearing Stream 3, in her s42A report<sup>3</sup>, noted that regional plans cannot require landowners or others to plant forest or restore and extend wetlands. Ms Guest proposed that Method CC.4: ‘Prepare a Regional Forest Spatial Plan’ use a partnership approach, with mana whenua and other key stakeholders, to identify where to promote and support planting and natural regeneration of permanent forest and associated browsing pest animal control, including how to give effect to Objective CC.5 and address contribute to achieving water quality targets for sediment, to inform the requirements of Policy CC.6.
36. Ms Guest recommended that the Regional Forest Spatial Plan include:
- a. a target for an increase in permanent forest extent in the Wellington Region to support achieving Objective CC.5,
  - b. evaluation of the potential impacts of increased afforestation on rural production and social wellbeing, and development of an approach that will maximise the environmental, social, and economic benefits,
  - c. ways to implement and support capability for increasing the area of indigenous forest, including the provision of incentives,

---

<sup>3</sup> [s42A \(wrc.govt.nz\) page 90](#)

- d. identification of the types of indigenous forest to prioritise for re-forestation, including links to the strategic indigenous biodiversity targets and priorities identified through Policy IE.3 and Method IE.3, and
  - e. a process to monitor and report on changes in the extent and health of permanent forest.
37. Federated Farmers support an integrated catchment approach to the management of sediment loss, supported in tangible ways by the Council and underpinned by non-regulatory methods such as FAPs and a Regional Forest Spatial Plan. We believe this approach provides an opportunity for the Council to demonstrate best practice in terms of management and protection of natural ecosystems including freshwater ecosystems. The Council can use their own farmland as an exemplar to communities and develop, in partnership with private landowners, innovative solutions to targeted at-risk areas.
38. Federated Farmers is very concerned about the dSedNet modelling to estimate the sediment load reductions required from catchments to meet the TASs for visual clarity. We believe there is too much model uncertainty and error for the model outputs to be used as a basis for policy decisions that will have drastic impacts on farming businesses. Greer et al<sup>4</sup> discuss limitations with the modelling and caution that *reported sediment loads should... be viewed as estimates only*.
39. The sediment load reduction modelling relies on data that is spatially and temporally very limited. Water quality monitoring sites, especially for Te Awarua-o-Porirua<sup>5</sup> are few in number. The proportional change in sediment load required to meet visual clarity targets in Te Awarua-o-Porirua was estimated using data from just three sites (Horokiri Stream at Snodgrass, Pāuatahanui Stream at Elmwood Bridge, and Porirua Stream at Milk Depot). According to Greer et al, there are three autosampled sites in Te Awarua-o-Porirua, but data from these was not included in the modelling.
40. Each monitoring site is used to gather water quality data water for large areas of land. For example, the Mākara Stream at Kennels monitoring site is used to determine water quality for 7203 ha, and Mangaroa River at Te Marua is used to determine water quality for 10,370 ha. Obviously, one monitoring site for such a large area of land cannot be expected to yield data that is 'representative' of all waterbodies within that area.
41. Data from monitoring sites is from grab samples taken once per month. Greer et al note that the data collected has a limited number of event-based flows, which would be expected with infrequent sampling. The modelling uses median clarity calculated from data collected over five years (2016 – 2021) and also uses previous modelled average annual loads for baseline state as a key input. Further issues with the data are that flow recorder sites do not always match the monitoring sites where clarity measurements are taken.

---

<sup>4</sup> [Greer-M.J.C.-Blyth-J.-Eason-S.-Gadd-J.-King-B.-Nation-T.-Oliver-M.-Perrie-A.-2023.-Technical-assessments-undertaken-to-inform-the-target-attribute-state-framework-of-proposed-Plan-Change-1-to-the-.pdf \(gw.govt.nz\)](#)

<sup>5</sup> There are five monitoring sites in TAoP and 18 monitoring sites in TWT according to Greer et al Table 36.

42. The Ministry for the Environment (MfE) note in the Guidance for Implementing the NPS-FM Sediment Requirements<sup>6</sup> *that errors and uncertainties within a model propagate at each step in the modelling process. A small error in input data can snowball into a substantial error in outputs.* MfE highlight that *there are considerable errors in load estimation from monitored water quality and flow data, particularly where water quality data is restricted to monthly grab samples and may not represent the full range of flows.* MfE's advice, as a key recommendation, *is to improve the current level of sediment monitoring and to collect flow data concurrently at sediment monitoring sites.*
43. MfE acknowledge that current knowledge on the effectiveness of erosion control measures to reduce sediment loads is imperfect. A 2020 report prepared for the Council<sup>7</sup> by Aquanet Consulting Limited describes the work an expert panel undertook for the Council to compare water quality and ecology effects under climate change and across three different management scenarios. The scenarios were BAU (the current regulatory and management approach), Improved (a significant step up in effort across several aspects of both urban and rural land and water management) and Sensitive (a further step up in effort to fully incorporate numerous water sensitive urban design and rural land and water management methods). The expert panel assessed and documented their relative level of confidence on predictions as to the efficacy of the three scenarios on water quality and ecology attributes. The report notes, very deliberately, that *the expert panel generally had a low-level of confidence in their assessments of how sediment input will change under the different scenarios, as they were primarily based on the modelled effects of climate change on flow which is subject to a high degree of uncertainty.*
44. The Aquanet report was part of the information considered by Te Awarua-o-Porirua whaitua committee in making their recommendations on policies. The committee recognised that uncertainties in the information available warranted caution against recommending load reductions at a catchment-scale<sup>8</sup>.
45. Federated Farmers seeks relief that the Council improve the quality and quantity of their monitoring data to inform the dSedNet modelling before any changes to policies and rules in the NRP are made. We note that clause 1.6(2)(b) of the NPS-FM requires councils to take all practicable steps to reduce uncertainty. Clause 1.6(1) requires councils to use, if practicable, complete and scientifically robust data. Federated Farmers contends that the data used to model the sediment load reductions is neither complete nor scientifically robust and is totally inadequate to underpin significant shifts in policy that have severe consequences for rural landowners.

### Sediment from Plantation Forestry

46. Many farmers in the Greater Wellington area have land planted in plantation forestry, as a long-term investment and recognising that some land use capabilities (LUCs) are more

---

<sup>6</sup> [Sediment-ME1663-Final-1.9.pdf \(environment.govt.nz\)](#)

<sup>7</sup> [Whaitua-Te-Whanganui-a-Tara-Water-Quality-and-Ecology-Scenario-Assessment.pdf \(gw.govt.nz\)](#)

<sup>8</sup> PC1 NRP s32 report, at page 52

suitable for forestry than pastoral/ arable farming. In fact, farmers have been encouraged to plant production forests through government and regional policies over many years. Policy WH.P28 and Rule WH.R22 seek to reduce sediment discharges by requiring that on highest erosion risk land (plantation forestry), plantation forestry is not established or continued beyond the harvest of existing plantation forests. This is a draconian approach that ignores technology advances that forest harvesters have made and will continue to make to harvest practices (such as the use of haulers rather than skidders, removal of slash from skid sites, limits to the area that can be harvested over certain periods of time, retaining a riparian margin around harvested areas and stream boundaries etc).

47. The policy is another example of 'managed retreat' for public good, with all the cost being borne by the landowner. Similar to the conversion of pastoral land to permanent forest, there are likely to be considerable challenges sourcing sufficient seedstock for planting and finding labour to plant native seedstock. There will be cost associated with sourcing specialist advice to ensure new plantings occur in a way that is consistent with the Emissions Trading Scheme (ETS) eligibility criteria to avoid plantings being ineligible for New Zealand Units (NZUs).
48. The conversion of exotic forest to permanent forest presents several difficulties in relation to the ETS. Specifically, these are:
  - a. Uncertainty around how the ETS treats the transition of registered exotic forests to native forest species,
  - b. Uncertainty around how averaging accounting would address a new planting rotation occurring on a very different basis to when the forested area was originally registered in the ETS
  - c. Uncertainty around the sequestration rates of native species (this work is still in its infancy and may need 5-6 more years to produce anything of any use)
  - d. Uncertainty around the possibility of needing to first de-register the exotic forest (and paying back all the NZUs earned from it) before registering the native forest as a new forest.
49. Federated Farmers would like to see this policy amended to enable the replanting of production forests so long as landowners can identify (through a consent application) how the management and harvest of the forest will be achieved without adverse effect on sediment in waterbodies.

### Riparian Management (Stream Shading and Livestock Access to Small Rivers)

50. Federated Farmers is generally supportive of efforts to promote the progressive shading of streams, if landowners are supported with financial assistance to fence, plant and maintain plantings and the width of the plantings is reasonable<sup>9</sup>.

---

<sup>9</sup> A review of the statistical relationship between set-back width and instream sediment reduction identified the sediment removal efficiencies for setbacks of 1 metre, 3 metres, and 5 metres are (in percentages) 15, 34, and 46 respectively. From: Sweeney, B.W., Newbold, J.D. (2014) Streamside Forest Buffer Width Needed to Protect Stream Water Quality, Habitat, and Organisms: A Literature Review. JAWRA Journal of the American Water Resources Association, 50(3): 560-584. 10.1111/jawr.12203

51. However, it should be noted that in the short term (circa 20 years), stream shading may not be a sediment control measure that assists the Council in its trajectory to meeting proposed TASs. This is because shade from dense planting can cause the loss of undergrowth and bank-armouring vegetation, such as grasses, leading to a transient phase of increased bank erosion in small streams as the stream channel widens. The loss of undergrowth can also lead to sheetwash and rilling, which can further increase sediment loads.<sup>10</sup> Sediment related water quality following riparian planting is likely to get worse before it gets better as stream banks erode and channels widen in response to increased tree shade<sup>11</sup>.
52. Objectives in the proposed NRP require that by 2100, all freshwater bodies have planted margins. Taken at its literal reading, this would mean every stream, river, lake, wetland and spring within the Waitua would have to be planted, including urban water bodies. Whilst this is aspirational, and may eventually contribute to better water quality, it is not practical or even possible to plant every stream margin (for example where topography doesn't allow for a riparian margin).
53. According to the s32 report, excluding stock from small streams (<1m) within the Mangaroa River and the Mākara Stream catchments will *likely* make an important contribution to addressing water quality issues, specifically visual clarity which is below the national bottom line and *E. coli* which is below the TAS. This may be true, but in reality there has been very little research done in New Zealand on the effectiveness of riparian management measures to reduce stream bank erosion<sup>12</sup>. Importantly, Hughes (2016) notes that a one size fits all approach to riparian management measures to reduce stream bank erosion is unlikely to be appropriate or effective.
54. This is the sort of knowledge that must be considered in the preparation of FAPs to address interim and long-term priorities, including attaining the national bottom lines for TASs, and what can realistically be achieved by interventionist policies.
55. The s32 report links stream shading policies to the management of periphyton growth. Federated farmers notes that in nearly all part FMUs the Council has insufficient data on periphyton biomass. We suggest the Council undertake further monitoring to understand periphyton growth characteristics in the region. We support the Council's intention to address periphyton growth in specific 'hot spots' through FAPs.

---

<sup>10</sup> Ministry for the Environment. 2022. *Guidance for implementing the NPS-FM sediment requirements*. Wellington: Ministry for the Environment.

<sup>11</sup> Rob Davies-Colley & Andrew Hughes (2020): Sediment-related water quality of small hill-country streams near Whatawhata, New Zealand. Response to integrated catchment management (ICM), New Zealand Journal of Marine and Freshwater Research, DOI: 10.1080/00288330.2020.1761840

<sup>12</sup> AO Hughes (2016): Riparian management and stream bank erosion in New Zealand, New Zealand Journal of Marine and Freshwater Research <http://dx.doi.org/10.1080/00288330.2015.1116449>

## Management of Nutrients

### Small Farms

56. Method M42 requires properties between 4ha and 20 ha and where winter stocking rate is greater than 12 stock units per hectare to be registered with the Council, despite the Council having no evidence that small properties make a meaningful contribution to catchment-scale nitrogen (N) losses. It's difficult to understand what problem the Council is trying to solve with its approach to nutrient management for sites under 20 hectares in the two whitua. The s32 report infers that there must be something to manage, because these properties are generally on better quality land that could (theoretically) support more intensive land use. However, the Council presents no sound evidence that there is any issue with nutrient losses from small farms, or that their recommended policies and rules are necessary.
57. Registration of these properties, and annual assessments of N loss risk will create a needless administrative burden for small property holders and the Council. Failure to comply with the requirement for annual nitrogen discharge risk assessments for these parcels will needlessly trigger requirement for resource consent, with associated costs for landowners and burden for the Council, for what amounts to little or no environmental benefit. The quality of data from the annual assessments, which Federated Farmer's understands will be a 'simple online tool' (Gerard Willis *per comm* 4 December 2023) may be low, and therefore of limited use, without a full range of relevant input data and interpretation.
58. Moreover, strict N loss management is unnecessary because nitrogen is not a significant problem in the region's freshwater bodies to begin with. The Council's own attribute state baselines show that river and stream surface water bodies are almost all within the NOF 'A' Band for nitrate and ammonia toxicity under the National Policy Statement for Freshwater Management (2020) (NPS-FM), with a relatively small number of sites in the 'B' Band and lakes in the 'B' and 'C' Bands. There are no freshwater bodies in rural areas with attribute states in the 'D' or 'E' Bands for nitrogen related attributes.
59. Federated Farmers opposes the requirement for all small farms between 4ha and 20 ha to register with the Council, and to prepare an annual nitrogen risk loss assessment. We consider that these requirements provide no environmental benefit, are an unnecessary burden for small block owners, and provide little or no meaningful data for the Council.

### Properties greater than 20ha

60. The generally low N concentrations throughout the rural areas of the two whitua are partly due to the type of farming that is predominant in the catchments. Most pastoral farms are mixed sheep and beef farms and are not intensively farmed. These properties typically have a lower N footprint than other types of farming and the risk of dissolved inorganic nitrogen (DIN) polluting waterways is very low.

61. The s32 report articulates that hill country farms in the two whitua apply little, if any nitrogen and overall, stocking rates are very low. Even though monitoring shows that river and stream surface water bodies are almost all within the NOF 'A' Band for nitrate toxicity and ammonia toxicity, the Council's proposed policies are to manage N loss reductions by land retirement and destocking (as a response to the need to reduce sediment loss).

## Take and Use of Water - Te Awarua-o-Porirua Whaitua

### Permitted water takes

62. The Council has limited information on what proportion of water abstraction is taken under the current permitted activity rules or is authorised under s14(3)(b) of the RMA. Federated Farmers supports the recommendation of Thompson<sup>13</sup> that periodic surveys be conducted to gather more information on these takes as and when required (for example, to coincide with catchment-wide expiry of consented takes). This is a much more pragmatic approach than requiring metering for every permitted water take, which would be unduly costly for water users to implement and for the Council to administer.

### Water allocation (consented takes)

63. In the Porirua, Pāuatahanui and Horokiri catchment management units, the allocation limits and minimum flows are proposed to be expressed as specific numbers rather than default percentages of mean annual low flow (MALF) as set out in operative policies of the NRP. Federated Farmers support this change, as it makes it clearer for water users and Council staff what the limits are.
64. For Porirua, Pāuatahanui and Horokiri catchment management units, a Restricted Discretionary Activity rule is proposed for takes that are not otherwise permitted or controlled, and which meet the minimum flow requirements and allocation limits. The Controlled Activity rule (Rule R157) for the take and use of water in the operative NRP is proposed to be removed for Te Awarua-o-Porirua Whaitua. We question why takes that meet the minimum flow requirements and allocation limits should be classified as Restricted Discretionary, as proposed in PC1. In our view, takes that meet minimum flow requirements and are within allocation limits should be assessed under a Controlled Activity rule, which would provide more certainty for water users and would be less expensive for the Council to administer.
65. All allocation limits in the Te Awarua-o-Porirua Whaitua (both specified and default) are proposed to be based on 20% of MALF, rather than 30% as in the operative NRP. The Te Awarua-o-Porirua Whaitua Committee considered the allocation limits of streams in the whitua in detail<sup>14</sup> and were advised that a minimum flow of 90% of MALF and an allocation limit of 30% of MALF (90 + 30) *was at the environmentally conservative end of the spectrum*,

<sup>13</sup> [Thompson-M.J.-2023.-Plan-Change-1-Te-Awarua-o-Porirua-Water-quantity-and-allocation-technical-report.pdf \(gw.govt.nz\)](#)

<sup>14</sup> [Te-Awarua-o-Porirua-Whaitua-Implementation-Programme.pdf \(gw.govt.nz\)](#)

*meaning the limits provide well for the ecological health, habitat space and mahinga kai species such as the taonga species tuna (longfin eels).* The whitua committee were advised that the 90 + 30 approach gave good levels of habitat protection of between 90% and 98% habitat protection for native fish species at minimum flow<sup>15</sup>. The committee considered other allocation limits (including 20% of MALF) but agreed that the status quo allocation limit of 30% should remain (recommendation 68).

66. The subsequent proposal by Council staff to amend the allocation limit to 20% of MALF appears to be a 'nod' to the revised NPS-FM 2020, in particular the hierarchy of Te Mana o Te Wai. According to Thompson<sup>16</sup> the whitua committee might have adopted a more precautionary approach had the hierarchy of Te Mana o Te Wai been in place at the time of their considerations (as to this, we will never know). In setting aside the recommendation of the committee, the Council has relied on advice from Cawthron Institute<sup>17</sup>. Cawthron's advice was based on default minimum flow and allocation limits originally recommended for streams and rivers in Otago and later recommended for Greater Wellington.
67. Policy P.P32 of PC1 applies an allocation limit of 20% of MALF to all waterbodies in the Porirua whitua including rivers, and category A and B groundwater (stream depletion). Thompson considers this to be a more 'precautionary' approach and more aligned with Te Mana o Te Wai.
68. The concept of Te Mana o te Wai, at clause 1.3 of the NPS-FM, refers to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. It protects the mauri of the wai. However, the concept also refers to restoring and preserving the balance between the water, the wider environment, and the community.
69. The National Objectives Framework (NOF) guidelines state that *the reference to 'balance' isn't intended to signal a trade-off between Te Mana o te Wai and other goals. It emphasises that healthy freshwater is a prerequisite for a healthy wider environment and community, and that it is vital to keep those elements in balance.*
70. Federated Farmers considers that the whitua committee did a good job of considering the balance between ecosystem health and mahinga kai and economic use of water when they made their recommendation to retain the 90 + 30 approach to minimum flow and allocation amounts. The committee were entitled to rely on advice that the approach was environmentally conservative and would provide habitat protection of between 90% and 98% habitat protection for native fish species at minimum flow. They determined that the

---

<sup>15</sup> [Water-allocation-alternative-levels-of-minimum-flow-and-allocation-limit.pdf \(gw.govt.nz\)](#)

<sup>16</sup> [Thompson-M.J.-2023.-Plan-Change-1-Te-Awarua-o-Porirua-Water-quantity-and-allocation-technical-report.pdf \(gw.govt.nz\)](#)

<sup>17</sup> Shearer K and Hayes J 2021. Environmental flows and allocation investigations for small streams in the Greater Wellington region. Prepared for Greater Wellington Regional Council. Cawthron Report No. 3674. 66 p. plus appendices.

approach would provide good protection for ecosystem health and moderate reliability for both supply and availability of water.

71. Federated Farmers supports the recommendation of the whitua committee, who we believe made their recommendation on the basis that the 90 + 30 freshwater management framework would protect ecosystem health whilst providing for the needs of the community. Accordingly, we seek relief that the allocation limit for freshwater bodies in Te Awarua-o-Porirua Whitua be returned to 30% of MALF.

## Freshwater Action Plans

72. Federated Farmers supports the development and use of Freshwater Action Plans in principle. We note that the s32 report states that *the involvement of communities and institutional stakeholders in action planning is welcomed but it is not considered appropriate to direct partnerships through Plan Change 1* and that *the key partnership Council is wishing to prescribe in PC1 for freshwater action planning is the Council's treaty partnership with mana whenua*.
73. Whilst acknowledging the importance of the Council's partnership with mana whenua/ tangata whenua, there is ample evidence that the engagement of the community (as a whole) confers legitimacy upon planning and decision-making processes<sup>18</sup>. The NPS-FM also recognises the importance of community engagement within the fundamental concept of Te Mana o te Wai (clause 1.3(1)), within the hierarchy of obligations of Te Mana o te Wai (clause 1.3(5)), within the Part 2 objective of the NPS, and elsewhere (e.g., Policy 5 and Policy 15 of clause 2.2).
74. In November 2023, the 42A officer for PC1 of the Regional Policy Statement Plan Hearing Stream 5 (Freshwater) recommended changes to Method FW.1: of the Wellington Regional Council Regional Policy Statement (RPS) as follows:

Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua, and through engagement with communities, stakeholders and territorial authorities, as required by the NPS-FM to contribute to achieving the target attribute states set in the NRP.

75. This change was supported by Federated Farmers as it gives effect to the NPS-FM (clause 3.7(1)(a)). The RPS wording should align with the wording in Methods M36 - 41 of the proposed NRP in relation to the development of FAPs. The involvement of communities, stakeholders and territorial authorities in the development of FAPs is especially important as the s32 report<sup>19</sup> acknowledges that achieving 12 of the 321 TASs across the two whitua will require actions in addition to those currently contemplated, and that the nature and scale of

<sup>18</sup> Rijal, S. (2023). The importance of community involvement in public management planning and decision-making processes. *Journal of Contemporary Administration and Management* Vol1 Issue 2 August 2023 pp 84-92.

<sup>19</sup> [Proposed-Plan-Change-1-Section-32-report.pdf \(gw.govt.nz\)](#) page 6.

these additional methods will be determined through the action planning processes after the plan-making process has been completed.

76. Federated Farmers notes that there are 72 triggers for FAPs across both whaitua. Addressing these triggers through the FAPs will be a lot of work for the Council, mana whenua and communities. We seek relief that the urban FAPs be completed by the end of 2026 and that rural FAPs be completed by the end of 2027.
77. Federated Farmers believes that the FAPs should be targeted to catchment-scale actions. We have concerns that the boundaries for the part-FMUs may need refining for the purposes of managing water quality in both rivers and receiving environments (e.g. harbours). For example, we understand that some part-FMUs have catchments that drain in different directions.

## Farm Environment Plans

78. Federated Farmers note that FEPs are referenced multiple times throughout PC1. Schedule 36 sets out the requirements for FEPs and references the certification requirements under the Resource Management (Freshwater Farm Plans) Regulations 2023. We suspect that the Council is using the term FEP interchangeably with the nationally mandated FWFP. Federated Farmers recommend that Council amend references to FEPs in the proposed NRP to FWFPs for consistency, and to avoid 'double-up' (two separate plans being required for the one property) and confusion.
79. According to Policy WH.P24 and Policy P.P21, FEPs have to be prepared and certified by 30 June 2027 for part FMUs where suspended fine sediment has a baseline state of D and/or where dissolved inorganic nitrogen is shown as being in need of improvement. Table 8.6 states that FEPs for Te Awa Kairangi rural streams and rural mainstems Parangārehu catchment streams and South-West Coast rural streams and Wainuiomata rural streams must be completed by 30 December 2025 and FEPs for Te Awa Kairangi lower mainstem Korokoro Stream must be completed by 30 December 2026. Table 9.5 states that FEPs are due 30 December 2025 for Taupō and Takapū part FMUs, and 30 December 2026 for Pouewe and Wai-O-Hata part FMUs.
80. Currently, the Wellington region has not been included in a national timetable for the roll-out of the nationally mandated FWFPs. The roll-out began in Waikato and Southland in August 2023. The next areas identified in the roll-out are Manawatu/ Whanganui, Otago and the West Coast, in early 2024. It is expected that the full roll-out will be complete by the end of 2025, with Wellington as one of the last regions to 'push go'<sup>20</sup>. Farm operators will have 18 months from the date the regulations are 'turned on' in their region to prepare their first plan for certification. In effect, this means that the earliest that FWFPs are likely to be required in the Wellington region is mid-2027.

---

<sup>20</sup> [Freshwater farm plans | Ministry for the Environment](#)

81. Farm operators in the region are required to have regard to catchment context information (catchment context challenges and values – CCCV) when preparing their FWFPs, information that the Council is required to collate under Clause 46 of the Resource Management (Freshwater Farm Plans) Regulations 2023. As well as collating the information, ground-truthing it with farmers, and publishing it, the Council needs to be confident that certifiers and auditors understand the catchment context information before appointing them to work in the region<sup>21</sup>. This is an extensive body of work for the Council, and it should be done before farm operators are required to prepare their first FWFPs.
82. Table 8.4 and Table 9.2 (Target Attribute States) show that the worst water quality in the two whaitua is generally in urban catchments. In both whaitua, *E.coli* exceedances present the greatest challenge to achieving the Plan’s objectives, and in our view, the focus of effort should be on rules and methods in the urban catchments to address the gross exceedances of the NOF numeric states for this attribute. Addressing the *E. coli* exceedances as a high priority gives effect to the hierarchy of Te Mana o te Wai, as the presence of *E. coli* infers risk of campylobacter bacteria in drinking water (human health).
83. In summary, whilst Federated Farmers support the use of FWFPs to identify and manage on-farm risk to freshwater contamination, we oppose the dates for FEPs in Tables 8.6 and 9.5 for the following reasons:
- a. FWFPs are not required to be prepared by these dates as part of the national roll-out, and we doubt the dates will be achievable in any case.
  - b. The highest priority for freshwater improvement should be urban catchments with a specific focus on improving *E.coli*.
84. Federated Farmers seeks relief that Tables 8.6 and 9.5 be removed from the proposed NRP, and that the timing for the nationally mandated FWFPs be as determined in the national roll-out timeline.

## Summary

85. Federated Farmers generally supports the long term (2100) overarching objectives of PC1.
86. However, we believe that the 2040 dates to achieve some of the TAS’s are unrealistic and the Council must undertake more work to gather quality data to inform modelling used to underpin policy decisions. Freshwater action plans should be used to set realistic dates and determine appropriate measures to achieve the long-term objectives.
87. There are a number of proposed policies and rules in PC1 that will have severe consequences for some of our members. Federated Farmers believes these policies place undue burden on private property owners for, what is essentially a public good. Federated Farmers contend

---

<sup>21</sup> [Guidance-on-preparing-catchment-context-challenges-and-values-information.pdf \(environment.govt.nz\)](#)

that these policies should be removed, especially as the science underpinning them is not robust.

88. Federated Farmers reminds the Council that many policies and rules in the operative NRP have only recently been agreed through court assisted mediation (e.g. earthworks rules). We consider it too soon to start unravelling those agreed positions.
89. Federated Farmers support an integrated catchment approach to the management of sediment and nutrient loss, supported in tangible ways by the Council and underpinned by non-regulatory methods such as FAPs and a Regional Forest Spatial Plan.

---

**We wish to be heard in support of our submission.**





Once you have completed your feedback, please email to [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

Please enter your details below	
<p><b>*Submitter Name:</b> Full name, or Name of Organisation / Company</p>	Wairarapa Federated Farmers
<p><b>Contact person for submission:</b> (If different to above)</p>	see Part OneInsert
<p><b>Telephone no:</b> (Not required)</p>	See Part One
<p><b>*Address for service:</b> (Email, or physical address) Please note, an <u>email address</u> is the preferred method</p>	See Part One
<p><b>*I wish to be heard in support of my submission at a hearing</b></p>	Yes
<p><b>*I would consider presenting a joint case at the hearing with others who make a similar submission</b></p>	Yes
<p><b>*I could gain an advantage in trade competition through this submission</b></p>	No
<p>Only answer this question if you answered 'yes' to the above question. <b>I am directly affected by an effect of the subject matter of the submission that:</b> <b>A) adversely affects the environment; and</b> <b>B) does not relate to trade competition or the effects of trade competition</b></p>	Select A or B
<p><b>In providing a submission to Greater Wellington, I agree to having read and understood the terms and process outlined in our <b>Information Statement</b></b></p>	
<p>If providing a submission on behalf of a company / organisation <b>I confirm that I have authority to do so:</b></p>	E McGruddy
<p><b>Date: 15 Decemeber 2023</b></p>	
<p>Please enter your feedback in the next worksheet "<b>2) Feedback on Provisions</b>". All of the provisions in the proposed change have been included so please place your comments in the correponding cells. If you have questions on how to use this submission form please use our <b>Submitter User Help Guide</b> or email one of our friendly team at <a href="mailto:regionalplan@gw.govt.nz">regionalplan@gw.govt.nz</a></p>	

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	Decision Sought *
		Amended New Not applicable to Whaitua Not applicable to Te-Awarua-o- Porirua N/A	Support Oppose Neutral Amend Not stated	Freshwater Part 1 Schedule 1 Both	Please provide a summary of the reasons for your feedback on each provision to help us understand your position.	Please describe the actual changes to the provision that you would like to see and, where possible, include your suggested alternative wording.  NOTE: Any deletions should be identified using <del>strikethrough</del> , and insertions should be identified using <b>bold</b> .
<b>2 Interpretation</b>	<b>2.2 Definitions</b>	Amended		Both		
	Afforestation	New	Select stance	Freshwater		
	Allocation amount	Amended	Select stance	Part 1 Schedule 1		
	Annual stocking rate	New	Select stance	Freshwater		
	Catchment management unit	Amended	Select stance	Part 1 Schedule 1		
	Coastal water management units	New	Select stance	Part 1 Schedule 1		
	Containment standard	New	Select stance	Part 1 Schedule 1		
	Core allocation	Amended	Amend	Part 1 Schedule 1	reasons set out in body	Retain clause a; amend clause b iii to read 30%; and consequential change to b ii
	Dry weather discharges	New	Select stance	Part 1 Schedule 1		
	Earthworks	New	Oppose	Part 1 Schedule 1	WFF do not agree it is effective or efficient to propose different definitions for different whaitua; the operative definition was agreed during pNRP Environment Court mediation and should be retained	Retain operative definition for all whaitua
	Effective hectares	New	Select stance	Freshwater		
	Environmental outcomes	New	Select stance	Part 1 Schedule 1		
	Erosion and sediment management plan	New	Select stance	Freshwater		
	Erosion risk treatment plan	New	Select stance	Freshwater		
	Existing wastewater discharge	New	Select stance	Part 1 Schedule 1		
	Harbour arm catchments	New	Select stance	Part 1 Schedule 1		
	Harvesting	New	Select stance	Freshwater		
	High risk industrial or trade premise	New	Select stance	Part 1 Schedule 1		
	Highest erosion risk land (plantation forestry)	New	Oppose	Freshwater	methodology is not fit for purpose	delete definition
	Highest erosion risk land (pasture)	New	Oppose	Freshwater	methodology is not fit for purpose	delete definition
	High erosion risk land (pasture)	New	Oppose	Freshwater	methodology is not fit for purpose	delete definition
	Highest erosion risk land (woody vegetation)	New	Select stance	Freshwater	methodology is not fit for purpose	delete definition
	Hydrological control	New	Select stance	Part 1 Schedule 1		
	Impervious surfaces	New	Select stance	Part 1 Schedule 1		
	Intensive grazing	New	Select stance	Freshwater		
	Limit	New	Select stance	Part 1 Schedule 1		
	Mechanical land preparation	New	Select stance	Freshwater		
	Nationally threatened freshwater species	New	Select stance	Part 1 Schedule 1		
	Nitrogen discharge risk	New	Select stance	Freshwater		
	Part Freshwater Management Unit	New	Select stance	Freshwater		
	Primary contact sites	New	Select stance	Freshwater		
	Recognised Nitrogen Risk Assessment Tool	New	Select stance	Freshwater		
	Redevelopment	New	Select stance	Part 1 Schedule 1		
	Registration	New	Select stance	Freshwater		
	Registered forestry adviser	New	Select stance	Freshwater		
	Replanting	New	Select stance	Freshwater		
	Sacrifice paddocks	New	Select stance	Freshwater		
	Small stream riparian programme	New	Select stance	Freshwater		
	Stabilisation	New	Oppose	Part 1 Schedule 1	Retain operative definitions for improved efficiency	delete; retain operative definition for stabilised
	Stormwater	Amended	Select stance	Part 1 Schedule 1		
	Stormwater catchment or sub-catchment	New	Select stance	Part 1 Schedule 1		
	Stormwater management strategy	New	Select stance	Part 1 Schedule 1		
	Stormwater network	Amended	Select stance	Part 1 Schedule 1		
	Stormwater treatment system	New	Select stance	Part 1 Schedule 1		
	Stocking rate	New	Amend	Freshwater	consistent with farm practice	amend highest at any time to read average
	Stock unit	New	Select stance	Freshwater		
	Unplanned greenfield development	New	Select stance	Part 1 Schedule 1		
	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	New	Oppose	Freshwater	The operative definition was agreed during pNRP Environment Court mediation and should be retained	Retain operative definition
	Wastewater network catchment or sub-catchment	New	Select stance	Part 1 Schedule 1		
	Wet weather overflows	New	Select stance	Part 1 Schedule 1		
	Whaitua	Amended	Select stance	Part 1 Schedule 1		
	Winter Stocking rate	New	Select stance	Freshwater		
<b>3 Objectives</b>	<b>Amendments to Chapter 3 - Objectives</b>	Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O2	Not applicable to Whaitua	Select stance	Part 1 Schedule 1	Objective O2 is relevant to all whaitua	Retain for all whaitua
	Objective O5	Not applicable to Whaitua	Select stance	Freshwater	relevant to all whaitua	Retain for all whaitua
	Objective O6	Not applicable to Whaitua	Select stance	Part 1 Schedule 1	relevant to all whaitua	Retain for all whaitua
	Objective O17	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O20	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O34	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O35	Not applicable to Whaitua	Select stance	Part 1 Schedule 1	relevant to all whaitua	Retain for all whaitua

	Objective O36	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O37	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O38	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	<b>3.6 Water quality</b>	Amended/Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.1 Primary contact recreation and Māori customary use objectives in freshwater bodies.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.2 Secondary contact and Māori customary use recreation objectives in freshwater bodies.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.3 Contact recreation and Māori customary use objectives in coastal water.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	<b>3.7 Biodiversity, aquatic ecosystem health and mahinga kai</b>	Amended/Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.4 Rivers and Streams.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.5 Lakes.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.6 Groundwater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.7 Natural wetlands.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.8 Coastal waters.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	<b>3.8 Sites with significant values</b>	<b>Amended</b>		Part 1 Schedule 1		
	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies) and their significant values are protected and restored.	Amended	Select stance	Part 1 Schedule 1		
	Objective O28: Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.	Amended	Select stance	Part 1 Schedule 1		
<b>4 Policies</b>		Not applicable to Whait / Not applicable to Whaitua Te Awarua-o-Porirua		<b>Part 1 Schedule 1</b>		
	Policy P65: National Policy Statement for Freshwater Management requirements for discharge consents.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P70: Minimising effects of rural land use activities.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1	<i>relevant to all whaitua</i>	Retain for all whaitua
	Policy P71: Managing the discharge of nutrients.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P72: Priority Catchments.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P73: Implementation of farm environment plans in priority catchments.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P74: Avoiding an increase in adverse effects of rural land use activities and associated diffuse discharges of contaminants.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1	<i>Relevant to all whaitua</i>	Retain for all whaitua
	Policy P76: Consent duration for rural land use in priority catchments.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P77: Improving water quality for contact recreation and Māori customary use.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1	<i>Relevant direction re priorities for all whaitua</i>	Retain for all whaitua
	Policy P79: Quality of point source discharges to rivers.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P82: Avoiding inappropriate discharges to water.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P83: Minimising adverse effects of stormwater discharges.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P84: Managing land use impacts on stormwater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P85: Development of a stormwater management strategy for first-stage local authority and state highway network consents.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P86: Second-stage local authority and state highway network consents.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P87: Minimising wastewater and stormwater interactions.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P88: Assessing resource consents to discharge stormwater containing wastewater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P118: Water takes at minimum flows and minimum water levels.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater	<i>relevant to all whaitua</i>	retain for all whaitua
	Policy P121: Core allocation for rivers.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater	<i>relevant to all whaitua</i>	retain for all whaitua
	<b>4.6 Biodiversity, aquatic ecosystem health and mahinga kai.</b>	Amended		Part 1 Schedule 1		
	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Amended	Select stance	Part 1 Schedule 1		
	Policy P36: Restoring Wairarapa Moana	Amended	Select stance	Part 1 Schedule 1		
	<b>4.7.3 Sites with significant indigenous biodiversity value.</b>	Amended		Part 1 Schedule 1		
	Policy P45: Protecting trout habitat.	Amended	Select stance	Part 1 Schedule 1		
	<b>4.9.1 Discharges to land and water.</b>	Amended		Part 1 Schedule 1		

	Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.	Amended	Select stance	Part 1 Schedule 1		
<b>5.1 Air quality rules</b>	<b>5.1.2 Outdoor burning.</b>	Amended		Part 1 Schedule 1		
	Rule R1: Outdoor burning – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R3: Outdoor burning for firefighter training – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.4 Large scale combustion activities.</b>	Amended		Part 1 Schedule 1		
	Rule R7: Natural gas and liquefied petroleum gas – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R8: Diesel or kerosene blends – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R9: Biogas – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R10: Untreated wood – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R11: Coal, light fuel oil, and petroleum distillates of higher viscosity – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R12: Emergency power generators – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.5 Chemical and metallurgical processes.</b>	Amended		Part 1 Schedule 1		
	Rule R14: Spray coating within an enclosed space – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R15: Spray coating not within an enclosed space – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R16: Printing processes – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R17: Dry cleaning – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R18: Fume cupboards – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R19: Workplace ventilation – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R20: Mechanical processing of metals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R21: Thermal metal spraying – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.7 Dust generating activities.</b>	Amended		Part 1 Schedule 1		
	Rule R25: Abrasive blasting within an enclosed booth – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R26: Abrasive blasting outside an enclosed area – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R27: Handling of bulk solid materials – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R28: Cement storage – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.8 Food, animal or plant matter manufacturing and processing.</b>	Amended		Part 1 Schedule 1		
	Rule R29: Alcoholic beverage production – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R30: Coffee roasting – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R31: Food, animal or plant matter manufacturing and processing – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.9 Fuel storage</b>	Amended		Part 1 Schedule 1		
	Rule R33: Petroleum storage or transfer facilities – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.10 Mobile sources.</b>	Amended		Part 1 Schedule 1		
	Rule R34: Mobile source emissions – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.11 Gas, water and wastewater processes.</b>	Amended/New		Part 1 Schedule 1		
	Rule R35: Water and wastewater processes – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R35A: Gas processes – permitted activity.	New	Select stance	Part 1 Schedule 1		
	<b>5.1.12 Drying and kiln processes.</b>	Amended		Part 1 Schedule 1		
	Rule R36: Drying and heating of minerals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.13 Discharge of agrichemicals.</b>	Amended		Part 1 Schedule 1		
	General conditions for the discharge of agrichemicals.	Amended	Select stance	Part 1 Schedule 1		
	Rule R37: Handheld discharge of agrichemicals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R38: Motorised and aerial discharge of agrichemicals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R39: Agrichemicals not permitted – restricted discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.14 Fumigation.</b>	Amended		Part 1 Schedule 1		
	Rule R40: Fumigation – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.1.15 All other discharges</b>	Amended		Part 1 Schedule 1		
	Rule R42: All other discharges – discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.2 and 5.3 Discharges to land and water and land use rules</b>	Not applicable to Whaitua		Part 1 Schedule 1		
	Rule R48: Stormwater from an individual property – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1	<i>relevant to all whaitua</i>	retain for all whaitua
	Rule R49: Stormwater from new subdivision and development – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R50: Stormwater from new subdivision and development – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R51: Stormwater to land – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R52: Stormwater from a local authority or state highway network – controlled activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R53: Stormwater from a local authority or state highway network with a stormwater management strategy – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R54: Stormwater from a port or airport – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R55: All other stormwater – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		

	Rule R56: Water races – discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R57: Existing pumped drainage schemes – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R58: All other pumped drainage schemes – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R65: Wastewater discharges to coastal and fresh water – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R66: Discharges of wastewater to fresh water – non-complying activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R68: Discharge of treated wastewater from a wastewater network – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R101: Earthworks – permitted activity.	Not applicable to Whaitua	Oppose	Part 1 Schedule 1	<i>Operative rule agreed in pNRP Environment Court mediation and should be retained</i>	retain operative rule for all whaitua
	Rule R102: Construction of a new farm track – permitted activity.	Not applicable to Whaitua	Oppose	Freshwater	<i>Operative rule agreed in pNRP Environment Court mediation and should be retained</i>	retain operative rule for all whaitua
	Rule R103: Construction of a new farm track – controlled activity.	Not applicable to Whaitua	Oppose	Freshwater	<i>Operative rule agreed in pNRP Environment Court mediation and should be retained</i>	retain operative rule for all whaitua
	Rule R104: Vegetation clearance on erosion prone land – permitted activity.	Not applicable to Whaitua	Oppose	Freshwater	<i>Operative rule agreed in pNRP Environment Court mediation and should be retained</i>	retain operative rule for all whaitua
	Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity.	Not applicable to Whaitua	Oppose	Part 1 Schedule 1	<i>Operative rule agreed in pNRP Environment Court mediation and should be retained</i>	retain operative rule for all whaitua
	Rule R106: Earthworks and vegetation clearance for renewable energy generation – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R107: Earthworks and vegetation clearance – discretionary activity.	Not applicable to Whaitua	Oppose	Part 1 Schedule 1	<i>Operative rule agreed in pNRP Environment Court mediation and should be retained</i>	retain operative rule for all whaitua
	Rule R110: Use of rural land in priority catchments – permitted activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R111: Use of rural land in priority catchments – controlled activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R112: Use of rural land in priority catchments – discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	<b>5.4.4 Uses of beds of lakes and rivers general conditions.</b>	Amended		Part 1 Schedule 1		
	Beds of lakes and rivers general conditions.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.4.5 Uses of beds of lakes and rivers.</b>	Amended		Freshwater		
	Rule R128: New structures – permitted activity.	Amended	Amend	Freshwater	<i>For clarity and certainty as per pNRP mediated agreement</i>	Retain "except a structure permitted by rules R125, R126 and R127"
	Rule R132: Minor sand and gravel extraction – permitted activity.	Amended	Select stance	Freshwater		
	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance – discretionary activity.	Amended	Amend	Freshwater	<i>Effects can be managed through conditions on a controlled activity</i>	Provide for gravel extraction in Schedule F1 rivers as a controlled activity
	<b>5.4.7 All other uses of the beds of lakes and rivers.</b>	Amended		Part 1 Schedule 1		
	Rule R145: All other uses of river and lake beds – discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	<b>5.4.8 Damming and diverting water</b>	New		Freshwater		
	Rule R151A: Ongoing diversion of a river – permitted activity.	New	Select stance	Freshwater		
	<b>5.5 Water allocation rules</b>	Not applicable to Te Awarua-o-Porirua Whaitua		Freshwater		
	Rule R152: Take and use of water – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Oppose	Freshwater	<i>Insufficient evidence presented</i>	Retain in Porirua
	Rule R153: Farm dairy washdown and milk-cooling water – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R154: Water races – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R157: Take and use of water – controlled activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Oppose	Freshwater	<i>Insufficient evidence presented</i>	retain in Porirua
	Rule R158: All other take and use – discretionary activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
<b>6 Other methods</b>	<b>6.16 Freshwater Action Plan programme</b>	New		Freshwater		
	Method M36: Freshwater Action Plan programme.	New	Amend	Freshwater	<i>Amend for consistency with NPS-FM; timeframes are too ambitious to complete all by December 2026</i>	Amend clause a) - / tangata whenua, and through engagement with communities, stakeholder and territorial authorities ; amend clause b) to provide for urban FMUs by December 2026 and rural FMUs by December 2027
	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	New	Amend	Freshwater	<i>For consistency with NPS-FM</i>	Provide for engagement with communities, stakeholders and TAs
	Method M38: Freshwater Action Plan for the Rangitahi catchment.	New	Amend	Freshwater	<i>For consistency with</i>	Provide for engagement with communities, stakeholders and TAs

	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Amend	Part 1 Schedule 1		Provide for engagement with communities, stakeholders and TAs
	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Amend	Freshwater	<i>For consistency with</i>	Provide for engagement with community and landowners
	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	<b>6.17 Small farm property registration</b>	New		Freshwater		
	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Oppose	Freshwater	<i>Reasons set out in body</i>	delete
	<b>6.16 Supporting improved water quality outcomes.</b>	New		Part 1 Schedule 1		
	Method M43: Supporting the health of urban waterbodies.	New	Select stance	Part 1 Schedule 1		
	Method M44: Supporting the health of rural waterbodies.	New	Amend	Part 1 Schedule 1	<i>Reasons set out in body, WFF seek a more pro-active and evidence based catchment approach for making progress</i>	Delete proposed text and add text directing Council to work in partnership with primary sector organisations and landowners to support an integrated catchment management approach including collection of baseline biophysical and ecological data at catchment scale, development of Freshwater Action Plans at catchment scale, preparation of Catchment Context, Challenges and Risks documents as set out in the national Freshwater Farm Plan Regulations, and directing Council assistance with riparian planting, erosion and sediment control for 100% of farms in rural catchments by x date, eg, 2030 (similar to that provided for in NRP Method M12)
	Method M45: Funding of wastewater and stormwater network upgrades	New	Amend	Part 1 Schedule 1	<i>Reasons set out in body, including equity across urban and rural communities</i>	Amend to direct Council to identify additional sources of funding for erosion/sediment controls and riparian management in rural areas to support achievement of TAS, including funding to provide for voluntary buyout of land; and/or insert a new policy directing Council to this effect
<b>8 Whaitua Te Whanganui-a-T</b>	<b>8.1 Objectives</b>	New		Both		
	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	New	Amend	Part 1 Schedule 1	<i>For improved consistency with providing for all values as set out in the NPS-FM and WIPs; and amend for practical achievability</i>	Amend to provide for a thriving primary production sector as part of the longterm vision; delete clause directing "all freshwater bodies have planted margins".
	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	New	Amend	Freshwater	<i>As set out in body including that timeframes should be determined as part of the prioritisation process anticipated in the Freshwater Action Plans</i>	Amend to delete "by 2040" and to provide for timeframes for achievement of TAS to be developed through the Freshwater Action Plan process and incorporated in a future variation; delete clauses a) to h) or alternatively, amend b) to delete "to a more natural state"; amend g) to add at priority primary contact recreation sites; add clause to provide for reliable water to support a thriving primary production sector
	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	New	Amend	Part 1 Schedule 1	<i>For consistency with WH.O8</i>	Amend chapeau to read the health and wellbeing of coastal water quality etc are at least maintained or improved where TAS are not met and by 2040...; delete e)-h)
	Table 8.1 Coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>For consistency with the NPS-FM</i>	Add column for measured baseline state; amend numeric targets to read maintain or improve; delete timeframe
	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	New	Amend	Part 1 Schedule 1	<i>Threat classification relies on factors outside the scope of this objective.</i>	Delete "improving their threat classification"
	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	New	Amend	Freshwater	<i>For consistency with WH O8; and with NPS-FM 1.6 (2b) direction to take all practicable steps to reduce uncertainty</i>	Amend a) to read improve where TAS are not met (delete to achieve); delete clauses b)-d); add clause directing collection of robust data for assigning baseline state
	Table 8.2 Target attribute states for lakes.	New	Select stance	Freshwater	<i>As set out in body</i>	Delete timeframe; delete attributes based on unknown or limited data; add direction to collect robust data for assignment of baseline state
	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	New	Amend	Freshwater	<i>To provide for NPS-FM and WIP values</i>	Amend d) to provide for sufficient reliability for the needs of communities and a thriving primary production sector
	Objective WH.O7: The physical integrity of aquifers is protected so that confined aquifer pressures are maintained.	New	Select stance	Freshwater		
	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	New	Support	Freshwater	<i>WFF support prioritising primary contact sites for improvement</i>	Add clause directing collection of robust data for sites with insufficient information
	Table 8.3 Primary contact site objectives in rivers.	New	Amend	Freshwater		
	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	New	Amend	Freshwater	<i>set out in body</i>	Amend a) to read improve where the TAS is not met (delete is met); delete b) and c); add clause directing collection of robust data for assessing baseline state and monitoring progress in all rivers within the part FMUs and for other rivers/catchments within the part-FMUs
	Table 8.4: Target attribute states for rivers.	New	Amend	Freshwater	<i>Too many gaps and uncertainties for Table 8.4 to be relied on in its current form</i>	Delete timeframes; delete sites/attributes where baseline state is based on limited data or further monitoring is needed; delete columns titled part FMU default TAS; amend NOF attributes to use NOF compliant metrics and statistics; amend baseline state for the monitored sites to use the latest Council data (eg, from the 2021/22 River Water Quality and Ecology Monitoring report)
	<b>8.2 Policies</b>	New		Both		
	Policy WH.P1: Improvement of aquatic ecosystem health.	New	Amend	Part 1 Schedule 1	<i>Consistent with WIP recommendations for a more strategic and prioritised approach</i>	Add new clause aa) directing improved understanding of key contaminant sources, their connection to waterways and spatial/temporal patterns, and identification of a prioritised programme; amend a) to add progressively restoring in priority catchments/locations; amend b) to read progressively restoring habitats in priority locations; add new clause e) to provide for Council to enter into voluntary buy-out of sites/land where significant changes in land use activities may be required

	Policy WH.P2: Management of activities to achieve target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>Consistent with WIP recommendations to provide incentives to assist implementation of existing national and regional regulations; and consistent with NRP Method M12</i>	Amend e) to read promote and support riparian fencing and planting (delete proposed text); amend f) to read promote and support erosion and sediment control (delete proposed text); delete g) and h)
	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Amend	Freshwater	<i>For consistency with the NPS-FM; and for an achievable work programme</i>	Add engagement with the wider community; delete "all" to read "urban" FAPs to be completed by December 2026, and "rural" FAPs to be completed by December 2027; add direction to identify appropriate and prioritised timeframes for TAS (for incorporation in a future variation)
	Policy WH.P4: Achievement of the visual clarity target attribute states.	New	Amend	Freshwater	<i>Insufficient evidence to support the proposed reductions</i>	Amend to delete a) and b); add clause directing sediment source studies to establish fit for purpose information on relative sources and spatial-temporal patterns including consideration of natural factors impacting clarity (eg, Mangaroa/peat, Pauhatanui/soft-bottom substrate) and to help identify and prioritise catchments/actions
	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	New	Select stance	Freshwater	<i>Certain of the national bottomlines are aspirational, including for Makara and Mangaroa; and baseline sediment loads are uncertain</i>	Delete Table 8.5
	Policy WH.P5: Localised adverse effects of point source discharge.	New	Amend	Part 1 Schedule 1	<i>For improved clarity</i>	Amend chapeau to read "including by avoiding or minimising"
	Policy WH.P6: Cumulative adverse effects of point source discharges.	New	Amend	Part 1 Schedule 1	<i>For consistency with WFF relief on objectives</i>	Amend chapeau to read avoided or minimised; amend part FMU to read "monitored rivers"
	Policy WH.P7: Discharges to groundwater.	New	Amend	Freshwater	<i>NRP PC1 does not provide evidence of degraded groundwater</i>	Amend to delete the reference to "existing discharges ..." and insert a requirement for investigation and groundtruthing of degraded groundwater
	Policy WH.P8: Avoiding discharges of specific products and waste.	New	Amend	Part 1 Schedule 1	<i>For consistency with c) and d)</i>	Amend b) to read untreated human or animal effluent (delete proposed text)
	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>For consistency with intent</i>	Amend chapeau to read stormwater <u>network</u> discharges
	Policy WH.P10: Managing adverse effects of stormwater discharges.	New	Amend	Part 1 Schedule 1	<i>For consistency with intent</i>	Amend chapeau to read stormwater <u>network</u> discharges
	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P12: Managing stormwater from a port or airport.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	New	Amend	Part 1 Schedule 1	<i>For improved clarity</i>	Amend chapeau to read new <u>urban</u> greenfield development
	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	New	Amend	Part 1 Schedule 1	<i>For clarity</i>	Amend chapeau to read new <u>urban</u> greenfield development
	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	New	Amend	Part 1 Schedule 1	<i>For clarity</i>	Amend chapeau to read unplanned <u>urban</u> greenfield development
	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	New	Select stance	Freshwater		
	Policy WH.P19: Managing wastewater network catchment discharges.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P20: Managing existing wastewater treatment plant discharges.	New	Select stance	Part 1 Schedule 1		
	<b>8.2.4 Rural land use and earthworks</b>	New		Both		
	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Amend	Freshwater	<i>For consistency with WIP recommendations</i>	Amend chapeau to add sediment; amend a) to direct collection of robust baseline state data in all rural catchments (delete proposed text); amend b) to direct groundtruthing and identification of priority catchments for improvement (delete proposed text); amend c) and d) to direct promoting and supporting strategic riparian and hill-slope planting (delete proposed text)
	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	New	Oppose	Freshwater	<i>Addressed by WFF relief on Policy P21; Periphyton has not been identified as an issue requiring nitrogen controls. Data from the few sites monitored by Council (2021/22 river monitoring report) show no sites below national bottomlines in this whaitua.</i>	Delete P22; or alternatively delete proposed text and amend to direct that Council undertake monitoring of periphyton as directed by NOF (requirement introduced in 2014) at SOE monitoring sites and also at catchment sites (location to be determined through the Freshwater Action Plan process)
	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	New	Oppose	Freshwater	<i>Addressed by WFF relief on P21; the erosion risk methodology is uncertain and hasn't been ground-truthed; and Council cannot require revegetation by regulation</i>	Delete P23
	Policy WH.P24: Phasing of farm environment plans.	New	Oppose	Part 1 Schedule 1	<i>Farm plans are already covered by national regulation</i>	Delete P24

	Policy WH.P25: Managing rural land use change.	New	Oppose	Freshwater	<i>The provision is disproportionate to the reality of rural land use in the whaitua</i>	Delete P25
	Policy WH.P26: Managing livestock access to small rivers.	New	Amend	Freshwater	<i>No evidence has been presented on the extent to which stock access in the low stocking rate farms in those catchments are contributing to bank erosion and reduced clarity</i>	Amend to direct groundtruthing of bank erosion in the Makara and Mangaroa catchments, investigation of natural sources related to clarity (eg, Mangaroa/peat) and identification of prioritised locations/reaches for supporting riparian planting; delete text as notified
	Policy WH.P27: Promoting stream shading.	New	Amend	Freshwater	<i>Consistent with WFF relief on the objectives</i>	Amend to read promoting <u>and supporting</u> ; delete proposed text from "where nutrient reductions...."
	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	New	Oppose	Freshwater	<i>Addressed by existing national and regional regulation</i>	Delete P28
	Policy WH.P29: Management of earthworks.	New	Oppose	Part 1 Schedule 1	<i>Addressed by existing NRP provisions which were recently made operative subsequent to mediated agreements.</i>	Delete P29
	Policy WH.P30: Discharge standard for earthworks.	New	Oppose	Part 1 Schedule 1	<i>As for row 252 reasons</i>	Delete P30
	Policy WH.P31: Winter shut down of earthworks.	New	Select stance	Part 1 Schedule 1	<i>As for row 252 reasons; and as set out in body</i>	Delete P31, or specify application to urban only
	<b>8.2.5 Water allocation</b>	New		Freshwater		
	Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>For consistency</i>	Amend to make provision for takes below minimum flows as provided for in Chapter 9 Policy P31
	Policy WH.P33: Core allocation in Whaitua Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>For improved clarity</i>	
	<b>8.3 Rules</b>	New		Both		
	<b>8.3.1 Discharges of contaminants</b>	New		Part 1 Schedule 1		
	Rule WH.R1: Point source discharges of specific contaminants – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	<b>8.3.2 Stormwater</b>	New		Both		
	Rule WH.R2: Stormwater to land – permitted activity.	New	Select stance	Freshwater		
	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R9: Stormwater from a local authority or state highway network–restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R10: Stormwater from new state highways– discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R12: All other stormwater discharges – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	<b>8.3.3 Wastewater</b>	New		Part 1 Schedule 1		
	Rule WH.R14: Wastewater network catchment discharges – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R15: Existing wastewater discharges from a treatment plant – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R16: All other discharges of wastewater – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	<b>8.3.4 Land uses</b>	New		Freshwater		
	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	New	Amend	Freshwater	<i>Consistent with WFF relief re national Freshwater Farm Plans</i>	Delete R17
	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	New	Oppose	Freshwater	<i>Retain operative NRP rule</i>	Delete R18
	Rule WH.R19: Vegetation clearance – discretionary activity.	New	Oppose	Freshwater	<i>Retain operative NRP rules</i>	Delete R19
	Rule WH.R20: Plantation forestry – controlled activity.	New	Oppose	Freshwater	<i>Retain operative NRP rules</i>	Delete R20
	Rule WH.R21: Plantation forestry – discretionary activity.	New	Oppose	Freshwater	<i>Retain operative NRP rules</i>	Delete R21
	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	New	Oppose	Freshwater	<i>Retain operative NRP rules</i>	Delete R22
	<b>8.3.5 Earthworks</b>	New		Both		

	Rule WH.R23: Earthworks – permitted activity.	New	Amend	Freshwater	Consistent with WFF relief re national Freshwater Farm Plans	Delete R23
	Rule WH.R24: Earthworks – restricted discretionary activity.	New	Oppose	Part 1 Schedule 1	Retain operative NRP rules	Delete R24
	Rule WH.R25: Earthworks – non-complying activity.	New	Oppose	Part 1 Schedule 1	Retain operative NRP rules	Delete R25
	<b>8.3.6 Nutrients and sediment from pastoral farming</b>	New		Freshwater		
	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares – permitted activity.	New	Oppose	Freshwater	Insufficient evidence that this is effective and efficient	Delete R26
	Rule WH.R27: Farming activities on 20 hectares or more of land – permitted activity.	New	Amend	Freshwater	Consistent with WFF relief re national Freshwater Farm Plans	Delete R27
	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	New	Oppose	Freshwater	Timeframes will be set in the national rollout	Delete Table 8.6
	Rule WH.R28: Livestock access to a small river – permitted activity.	New	Oppose	Freshwater	Consistent with WFF relief on policies	Delete R28
	Rule WH.R29: Livestock access to a small river – discretionary activity.	New	Oppose	Freshwater	as for row 293	Delete R29
	Rule WH.R30: The use of land for farming activities – discretionary activity.	New	Oppose	Freshwater	Consistent with WFF relief on objectives seeking relevant data for relevant catchments	Delete R30
	Rule WH.R31: Change of rural land use – discretionary activity.	New	Oppose	Freshwater	disproportionate to any real evaluation of existing and future rural land use	Delete R31
	Rule WH.R32: Farming activities – non-complying activity.	New	Oppose	Freshwater	As for R31	Delete R32
	<b>8.3.7 Take and use of water</b>	New		Freshwater		
	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a-Tara – restricted discretionary activity.	New	Amend	Freshwater	For improved efficiency	Amend to controlled activity (delete RD)
	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara – discretionary activity.	Amended	Select stance	Freshwater		
	Rule WH.R35: Take and use of water from outstanding rivers or lakes – non-complying activity.	Amended	Select stance	Freshwater		
	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation – prohibited activity.	Amended	Select stance	Freshwater		
	Table 8.7: Minimum flows for rivers in the Whaitua Te Whanganui-a-Tara.	Amended	Select stance	Freshwater		
	Table 8.8: Surface water allocation amounts for rivers and Category A groundwater and Category B groundwater in the Te Awa Kairangi/Hutt River, Wainuiomata River and Ōrongorongo River catchments.	Amended	Select stance	Freshwater		
	Table 8.9: Groundwater allocation amounts for Category B groundwater and Category C groundwater in the Whaitua Te Whanganui-a-Tara.	Amended	Select stance	Freshwater		
	Figure 8.1: Te Awa Kairangi / Hutt River and Upper Hutt groundwater in Tables 8.8 and 8.9.	Amended	Select stance	Freshwater		
	Figure 8.2: Te Awa Kairangi / Hutt River and Lower Hutt groundwater in Tables 8.8 and 8.9.	Amended	Select stance	Freshwater		
<b>Chapter 9 Te Awarua-o-Porirua Whaitua</b>	<b>9.1 Objectives</b>	New		Both		
	Objective P.01: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	New	Amend	Part 1 Schedule 1	For consistency with NPS-FM and WIP values	First bullet - delete or clarify meaning; second bullet - delete "in a natural state"; fourth bullet - delete or reword to express vision for natural character; add bullet to provide for sustaining a thriving primary production sector; add bullet providing for harbour sedimentation to be reduced to a more natural level
	Objective P.02: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.	New	Amend	Freshwater	For consistency with NPS-FM and NOF values; and to clarify distinction between the trajectory of improvement and the achievement of wai ora	Delete b, d, f and g; add clause providing for a thriving primary production sector including through the provision of reliable water
	Objective P.03: The health and wellbeing of coastal water quality, ecosystems and habitats in Pāuatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	New	Amend	Part 1 Schedule 1	set out in body and for WH	Amend chapeau to delete "to achieve" and to read improve where TAS are not met; delete a-h; add clause directing the collection of robust baseline data and development of prioritised timeframes for TAS for incorporation in a future variation
	Table 9.1: Coastal water objectives.	New	Amend	Part 1 Schedule 1	Numeric targets cannot reasonably be set in the absence of numeric baselines	delete timeframes; add column showing baseline state; amend numeric targets to read maintain or improve
	Objective P.04: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	New	Amend	Part 1 Schedule 1	Outside council control	Delete reference to improving threat classification status

	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	New	Support	Freshwater	<i>proportionate to the context</i>	retain as notified
	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	New	Amend	Freshwater		Amend to direct that water quality is maintained or improved where TAS are not met; delete a-c; add clause directing collection of robust data for assessing baseline state and monitoring progress in all rivers within the part FMUs and for other rivers/catchments within the part-FMUs as part of the Freshwater Action Plan process; amend to direct development of prioritised timeframes as part of the FAP process for incorporation in a future variation
	Table 9.2: Target attribute states for rivers.	New	Amend	Freshwater	<i>Baseline state should not be based on old or incomplete or modelled or default data</i>	Delete timeframes; delete all sites/attributes which are based on limited or modelled estimates; delete columns titled Part FMU default TAS; amend NOF attributes to use NOF compliant metrics and statistics; amend baseline state to use current data (eg, 2021/22 council monitoring data)
	<b>9.2 Policies</b>	New		Both		
	<b>9.2.1 Ecosystem health and water quality</b>	New		Both		
	Policy P.P1: Improvement of aquatic ecosystem health.	New	Amend	Part 1 Schedule 1	<i>See WH P1</i>	See WH P1
	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>See WH P2</i>	See WH P2
	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Amend	Freshwater	<i>see WH P3</i>	See WH P3
	Policy P.P4: Contaminant load reductions.	New	Amend	Part 1 Schedule 1	<i>See WH P4</i>	See WH P4
	Table 9.3: Harbour arm catchment contaminant load reductions.	New	Amend	Part 1 Schedule 1	<i>Evidence too uncertain</i>	delete Table 9.3
	Table 9.4: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state.	New	Amend	Part 1 Schedule 1	<i>Insufficient evidence</i>	delete Table 9.4
	<b>8.2.1 Discharges to water</b>	New		Both		
	Policy P.P5: Localised adverse effects of point source discharges.	New	Amend	Part 1 Schedule 1	<i>see WH P5</i>	see WH P5
	Policy P.P6: Point source discharges.	New	Amend	Part 1 Schedule 1	<i>see WH P6</i>	see WH P6
	Policy P.P7 Discharges to groundwater.	New	Amend	Freshwater	<i>see WH P7</i>	see WH P7
	Policy P.P8 Avoiding discharges of specific products and waste.	New	Amend	Part 1 Schedule 1	<i>see WH P8</i>	see WK P8
	<b>9.2.2 Stormwater</b>	New		Part 1 Schedule 1		
	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Amend	Part 1 Schedule 1	<i>See WH P9</i>	see WH P9
	Policy P.P10: Managing adverse effects of stormwater discharges.	New	Amend	Part 1 Schedule 1	<i>See WH P10</i>	see WH P10
	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	New	Select stance	Part 1 Schedule 1		
	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	New	Select stance	Part 1 Schedule 1		
	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	New	Select stance	Part 1 Schedule 1		
	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	New	Select stance	Part 1 Schedule 1		
	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	New	Select stance	Part 1 Schedule 1		
	<b>9.2.3 Wastewater</b>	New		Both		
	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	New	Select stance	Freshwater		
	Policy P.P18: Managing wastewater network catchment discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P19: Managing existing wastewater treatment plant discharges.	New	Select stance	Part 1 Schedule 1		
	<b>9.2.4 Rural Land Uses and Earthworks</b>	New		Both		
	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Amend	Freshwater	<i>see WH P21</i>	See WH P21
	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	New	Oppose	Freshwater	<i>See WH P22</i>	Delete P21
	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	New	Oppose	Freshwater	<i>See WH P23</i>	Delete P22
	Policy P.P23: Phasing of farm environment plans.	New	Oppose	Freshwater	<i>See WH P24</i>	Delete P23
	Policy P.P24: Managing rural land use change.	New	Oppose	Freshwater	<i>See WH P25</i>	Delete P24
	Policy P.P25: Promoting stream shading.	New	Amend	Freshwater	<i>See WH P27</i>	See WH P27
	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	New	Oppose	Freshwater	<i>See WH P28</i>	Delete P26
	Policy P.P27: Management of earthworks sites.	New	Oppose	Part 1 Schedule 1	<i>See WH P29</i>	Delete P27
	Policy P.P28: Discharge standard for earthworks sites.	New	Oppose	Part 1 Schedule 1	<i>See WH P30</i>	Delete P28
	Policy P.P29: Winter shut down of earthworks.	New	Oppose	Part 1 Schedule 1	<i>See WH P31</i>	Delete P29
	<b>9.2.5 Water allocation</b>	Amended/New		Freshwater		
	Policy P.P30: Minimum flows and minimum water levels in Te Awarua-o-Porirua Whaitua.	Amended	Select stance	Freshwater		
	Policy P.P31: Water takes at minimum flows and minimum water levels.	New	Support	Freshwater	<i>For clarity</i>	retain P31 as written
	Policy P.P32: Allocation in the Te Awarua-o-Porirua Whaitua.	New	Amend	Freshwater	<i>For consistency</i>	Amend a) to provide for the greater of the total allocated by resource consents or the allocation amounts; amend b) to read 30% (delete 20%)
	<b>9.3 Rules</b>	New		Both		
	<b>9.3.1 Discharges of contaminants</b>	New		Both		
	Rule P.R1: Point source discharges of specific contaminants – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R2: Stormwater to land – permitted activity.	New	Select stance	Freshwater		

	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas– controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R8: Stormwater from a local authority or state highway network–restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R9: Stormwater from new state highways– discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R10: Stormwater from new and redeveloped impervious surfaces– discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R11: All other stormwater discharges – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R12 – Stormwater discharges from new unplanned greenfield development – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	<b>9.3.3 Wastewater</b>	New		Part 1 Schedule 1		
	Rule P.R13: Wastewater network catchment discharges to water – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R15: All other discharges of wastewater – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	<b>9.3.4 Land uses</b>	New		Freshwater		
	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.	New	Amend	Freshwater	see WH R17	Delete
	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	New	Select stance	Freshwater	see WH R18	delete
	Rule P.R18: Vegetation clearance – discretionary activity.	New	Select stance	Freshwater	see WH R19	delete
	Rule P.R19: Plantation forestry – controlled activity.	New	Select stance	Freshwater	see WH R20	delete
	Rule P.R20: Plantation forestry – discretionary activity.	New	Select stance	Freshwater	see WH R21	delete
	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	New	Select stance	Freshwater	see WH R22	delete
	<b>9.3.5 Earthworks</b>	New		Both		
	Rule P.R22: Earthworks – permitted activity.	New	Amend	Freshwater	see WH R23	delete
	Rule P.R23: Earthworks – restricted discretionary activity.	New	Oppose	Part 1 Schedule 1	see WH R24	delete
	Rule P.R24: Earthworks – non-complying activity.	New	Oppose	Part 1 Schedule 1	see WH R25	delete
	<b>9.3.6 Nutrients and sediment from pastoral farming</b>	New		Freshwater		
	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares – permitted activity.	New	Oppose	Freshwater	see WH R26	delete
	Rule P.R26: Farming activities on 20 hectares or more of land – permitted activity.	New	Amend	Freshwater	see WH R27	delete
	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	New	Oppose	Freshwater	see WH R28	delete
	Rule P.R27: The use of land for farming activities – discretionary activity.	New	Oppose	Freshwater	see WH R30	delete
	Rule P.R28: Change of rural land use – discretionary activity.	New	Oppose	Freshwater	see WH R31	delete
	Rule P.R29: Farming activities – non-complying activity.	New	Oppose	Freshwater	see WH R32	delete
	<b>9.3.7 Take and use of water</b>	New		Freshwater		
	Rule P.R30: Take and use of water – permitted activity.	New	Oppose	Freshwater	Insufficient evidence to justify the change see WH R33	Delete R30 (retain existing operative rule)
	Rule P.R31: Take and use of water – restricted discretionary activity.	New	Amend	Freshwater		amend to controlled activity
	Rule P.R32: Take and use of water – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts – prohibited activity.	New	Select stance	Freshwater		
	Table 9.6: Minimum flows for Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	Table 9.7: Surface water allocation amounts for Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
<b>12 Schedules</b>		Amended/New		Both		
	Schedule A: Outstanding water bodies	New	Select stance	Part 1 Schedule 1		
	Schedule A2: Lakes with outstanding indigenous ecosystem values.	New	Select stance	Part 1 Schedule 1		
	Schedule F: Ecosystems and habitats with significant indigenous biodiversity values.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F2a: Significant habitats for indigenous birds in rivers.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F2b: Significant habitats for indigenous birds in lakes.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Amended	Select stance	Part 1 Schedule 1		

	Schedule F4: Sites with significant indigenous biodiversity values in the coastal marine area.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Amended	Select stance	Part 1 Schedule 1		
	Schedule 27: Freshwater Action Plan requirements.	New	Amend	Part 1 Schedule 1		
	A Freshwater Action Plans	New	Amend	Freshwater	<i>FAPs should be prepared at finer catchment scale to provide for proper local engagement, groundtruthing and prioritising; to determine baseline state which does not rely on defaults; and to align with preparation of Catchment Context, Challenges and Values documents to support national Freshwater Farm Plans</i>	Amend to read catchment (delete part-FMU)
	A1 Purpose	New	Amend	Freshwater	<i>For improved efficiency and effectiveness</i>	amend to direct identification of prioritised timeframes for TAS, to direct identification and prioritisation of the best bang for buck interventions; and to explicitly describe funding mechanisms to support delivery
	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>see row 411 reasons</i>	amend Part FMU column to read catchment and name the catchments
	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	New	Amend	Freshwater	<i>see row 411 reasons</i>	amend part FMU column to read catchments and name the catchments
	B Freshwater Action Plan requirements.	New	Select stance	Freshwater		
	B1. Principles.	New	Amend	Freshwater	<i>Improved consistency with NPS-FM</i>	Amend 1) to provide for engagement with community; amend 5) to direct preparation at catchment scale (unless whole or part FMU is more appropriate, eg, for fish passage); amend 6) to add identifying and prioritising best bang for buck interventions;
	B2. General Content.	New	Amend	Freshwater	<i>consistent with WFF relief on objectives</i>	Amend a) to direct identification of baseline state based on robust measured data at catchment scale; add 2b) to 1 and expand to add prioritisation of best bang for buck actions
	B3 Necessary actions.	New	Amend	Freshwater	<i>consistent with WFF relief on objectives and policies</i>	Amend 1A (first paragraph) to direct sediment source studies to establish fit for purpose information on the relative sources and spatial-temporal patterns in sediment transport to water, including consideration of rabbits and pigs, and to identify best bang for buck prioritisation (delete proposed text); amend ai) to direct the urgent analysis of efforts and costs to date to de-stock and revegetate council owned land; amend 2a) to direct e. coli source studies to establish fit for purpose information on relative sources of e coli to water, including wildfowl and pigs, and to identify best bang for buck prioritisation; amend 3 to direct periphyton monitoring as per NOF requirements; amend all references to Farm Environment Plans to read national FW Farm Plan.
	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	New	Amend	Freshwater	<i>consistent with WFF relief on policies</i>	amend 5a) to delete proposed text up to "encourage revegetation...."
	D Freshwater Action Plans in Te Awarua-o-Porirua Whaitua	New	Amend	Freshwater	<i>consistent with WFF relief on objectives and policies</i>	amend 5a) to direct periphyton monitoring; add at the end "in order to identify options for improvement"
	Schedule 28: Stormwater Contaminant Treatment.	New	Select stance	Part 1 Schedule 1		
	Table 1: Target load Reductions for Copper and Zinc	New	Select stance	Part 1 Schedule 1		
	Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc	New	Select stance	Part 1 Schedule 1		
	Schedule 29: Stormwater Impact Assessments.	New	Select stance	Part 1 Schedule 1		
	Schedule 30: Financial Contributions.	New	Select stance	Part 1 Schedule 1		
	A Context	New	Amend	Part 1 Schedule 1	<i>for clarity</i>	Amend to specify application to urban/infrastructure developments only
	B Purpose	New	Select stance	Part 1 Schedule 1		
	C Definition of an Equivalent Household Unit	New	Select stance	Part 1 Schedule 1		
	D Calculation of level of contribution	New	Select stance	Part 1 Schedule 1		
	Table D1. Financial contribution calculations for residential greenfield development	New	Select stance	Part 1 Schedule 1		
	Table D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways	New	Select stance	Part 1 Schedule 1		
	E Use	New	Select stance	Part 1 Schedule 1		
	Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Schedule 32: Wastewater Network Catchment Improvement Strategy.	New	Select stance	Part 1 Schedule 1		
	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	New	Oppose	Freshwater	<i>set out in body</i>	delete
	A Purposes of the Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>set out in body</i>	delete
	B Management objectives	New	Oppose	Freshwater	<i>set out in body</i>	delete
	C Requirements of the Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>set out in body</i>	delete
	C1 Contents of the Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>set out in body</i>	delete
	D Amendment of Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>set out in body</i>	delete
	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	New	Oppose	Freshwater	<i>set out in body</i>	delete
	A Purpose of the Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>set out in body</i>	delete
	B Management objectives	New	Select stance	Freshwater	<i>set out in body</i>	delete
	C Requirements of the Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>set out in body</i>	delete
	C1 Contents of the Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>set out in body</i>	delete
	C2 Certification of the Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>set out in body</i>	delete

	D Amendment of Erosion and Sediment Management Plan	New	Oppose	Freshwater	<i>set out in body</i>	delete
	Schedule 35: Small farm registration.	New	Oppose	Freshwater	<i>set out in body</i>	delete
	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Oppose	Freshwater	<i>set out in body</i>	delete
	A Certification requirements under the Resource Management (Freshwater Farm Plans) Regulations 2023.	New	Oppose	Freshwater	<i>set out in body</i>	delete
	B Management objectives.	New	Oppose	Freshwater	<i>set out in body</i>	delete
	C Content of a farm environment plan.	New	Oppose	Freshwater	<i>set out in body</i>	delete
	D Risk assessment and mitigation to address risk.	New	Oppose	Freshwater	<i>set out in body</i>	delete
	Table D1 Sediment loss and transport risk factors	New	Oppose	Freshwater	<i>set out in body</i>	delete
	E Erosion Risk Treatment Plan.	New	Oppose	Freshwater	<i>set out in body</i>	delete
	F Small stream riparian programme.	New	Oppose	Freshwater	<i>set out in body</i>	delete
<b>13 Maps</b>		New		Both		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 1: (Kāpiti).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: (Wellington Harbour).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 77: Habitats of nationally threatened freshwater species – Te Awarua-o-Porirua and Te Whanganui-a-Tara (Schedule F1).	New	Select stance	Part 1 Schedule 1		
	Map 78: Part freshwater management units and target attribute state sites (rivers) – Te Awarua-o-Porirua.	New	Amend	Freshwater	<i>consistent with WFF relief on objectives</i>	Amend to show catchments
	Map 79: Part freshwater management units and target attribute state sites (rivers) – Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>consistent with WFF relief on objectives</i>	Amend to show catchments
	Map 80: Part freshwater management units and target attribute state sites (lakes) – Te Whanganui-a-Tara.	New	Amend	Freshwater	<i>consistent with WFF relief on objectives</i>	amend to show catchments
	Map 81: Rivers and catchment management units for water takes – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 82: Coastal water management units – Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 83: Coastal water management units – Te Whanganui-a-Tara.	New	Select stance	Part 1 Schedule 1		
	Map 84: Harbour arm catchments – Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 85: Primary contact sites – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 86: Unplanned greenfield areas – Porirua City Council.	New	Select stance	Part 1 Schedule 1		
	Map 87: Unplanned greenfield areas – Wellington City Council.	New	Select stance	Part 1 Schedule 1		
	Map 88: Unplanned greenfield areas – Upper Hutt City Council.	New	Select stance	Part 1 Schedule 1		
	Map 89: Unplanned greenfield areas – Hutt City Council.	New	Select stance	Part 1 Schedule 1		
	Map 90: Highest and high erosion risk land (Pasture) – Te Awarua-o-Porirua.	New	Oppose	Freshwater	<i>methodology not fit for purpose</i>	delete
	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	New	Oppose	Freshwater	<i>methodology not fit for purpose</i>	delete
	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	New	Oppose	Freshwater	<i>methodology not fit for purpose</i>	delete
	Map 93: Highest and high erosion risk land (Pasture) – Te Whanganui-a-Tara.	New	Oppose	Freshwater	<i>methodology not fit for purpose</i>	delete
	Map 94: Highest erosion risk land (Woody vegetation/clearance) – Te Whanganui-a-Tara.	New	Oppose	Freshwater	<i>methodology not fit for purpose</i>	delete
	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	New	Oppose	Freshwater	<i>methodology not fit for purpose</i>	delete
	Map 96: Mākara catchment.	New	Select stance	Freshwater		
	Map 97: Mangaroa catchment.	New	Select stance	Freshwater		