

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**

To: Greater Wellington Regional Council

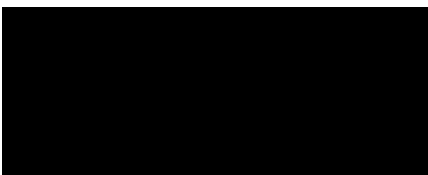
Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Environmental Defence Society Inc (S222)**

whose address for service is shay@eds.org.nz.

4. The particular parts of the submission WWL opposes, the reasons for that opposition, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
Section 5.4.5, Rule 128: New structures	Oppose	This is too onerous for Council water infrastructure.	Reject
Table 8.1 Coastal water objectives	Oppose	The target attribute states and coastal water objectives are already complex and highly aspirational. Further target attribute states would be unhelpful and unnecessary	Reject
Objective P.O3	Oppose	The target attribute states and coastal water objectives are already complex and highly aspirational.	Reject
All parts of the submission that request shorter timeframes for wai ora and TAS/CWO	Oppose	WWL opposes any shortening of the timeframes as notified, as this will make them unachievable.	Reject
Table 8.4: Target attribute states for rivers	Oppose	The target attribute states are already highly complex and aspirational. It is not clear what impact further changes may have on consenting network discharges, but WWL opposes any change that materially increases the difficulty of consenting.	Reject
WH.O9	Oppose	The change sought is inappropriate.	Reject

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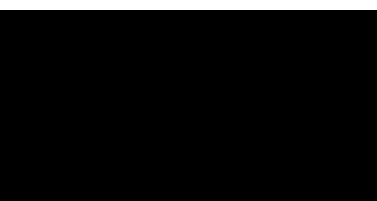
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2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Royal Forest and Bird Protection Society NZ (S261)**

whose address for service is a.geary@forestandbird.org.nz and freshwater@forestandbird.org.nz.

4. The particular parts of the submission WWL opposes, the reasons for that opposition, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



Part	Position	Reason	Outcome
All parts of the submission that seek inclusion of the term 'natural form and character' in the Whaitua objectives	Oppose	This term is broadly used but poorly understood, making it unclear what measures are needed to achieve the desired outcome	Reject
All parts of the submission that seek changes to water allocation provisions	Oppose	These parts are beyond the scope of PC1. Should it be determined that they are within the scope of PC1, WWL is opposed to them, as it supports the provisions as notified.	Reject
All parts of the submission that seek new target attribute states, interim target attribute states or changes to related timelines	Oppose	The target attribute states are already complex and highly aspirational. Further target attribute states are unnecessary and unhelpful. Setting interim target attribute states, or altering timelines will further complicate matters, particularly for sequencing and prioritisation of subcatchments.	Reject
Objective WH.O1 / P.O1	Oppose	The wai ora timeframe of 2050 is unachievable.	Reject
Policy WH.P2 / P.P2	Oppose	Avoidance is too onerous a requirement. It can have unexpected and undesirable outcomes when coupled with non-complying activity status.	Reject
Policy WH.P5 / P.P5	Oppose	The proposed changes are too onerous for network discharge consents.	Reject
Policy WH.P8 / P.P8	Oppose	These additions may be inappropriate for network discharge consents. For example, stormwater often picks up rubbish and fertilisers.	Reject
Policy WH.P10 / P.P9	Oppose	The phrase "toxicants, including" is too broad, and the focus should remain on zinc and copper.	Reject
Policy WH.P14 / P.P13	Oppose	It is unclear why a higher bar is set for the existing urban area than for greenfields. "Practicable" or "minimise" are appropriate words. "Possible" is not appropriate,	Reject
Policy WH.P15 / P.P14	Oppose	Financial contributions are a necessary and practicable tool in complex urban environments.	Reject
Policy WH.P19 / P.P18	Oppose	Elimination of dry weather discharges is not an appropriate target at this stage.	Reject

Policy WH.P20 / P.P19	Oppose	Insufficient information is provided to understand how this will impact on WWL's activities.	Reject
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2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Hutt City Council (S211)**

whose address for service is tim.johnstone@huttcity.govt.nz.

4. The particular parts of the submission WWL supports, the reasons for that support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

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victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
Policy WH.P7	Support	WWL supports reviewing the wording to clarify the intent of the provision	Accept
Policy WH.P10	Support	WWL supports developing a comprehensive policy and implementation framework with regard to hydrological control and water sensitive urban design measures, including acceptable solutions.	Accept
General	Support	WWL broadly supports the intent of Hutt City Council's submission in relation to Council's analysis regarding the increased cost to ratepayers to reduce discharges and contaminants.	Accept

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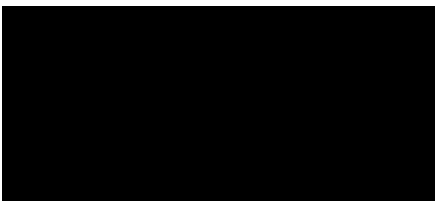
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2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Kāinga Ora (\$257)**

whose address for service is [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz).

4. The particular parts of the submission WWL opposes, the reasons for that opposition, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
[victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)





<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
Policies WH.P14 / P.P13	Oppose	WWL understands the direction of Kāinga Ora's submission point. However, without more detail WWL cannot understand how it will impact on WWL's activities, networks and consents. WWL is particularly interested to ensure that implementation does not increase cumulative effects on water quality that WWL would then be expected to resolve.	Reject
Policies WH.P15 / P.P14	Oppose	WWL opposes the deletion of the financial contribution policies.	Reject
Rules WH.R6 / P.R6	Oppose	WWL opposes a more lenient activity status where works are in accordance with a certified subcatchment management plan, as it is not clear who will decide what works are in accordance.	Reject

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2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**NZ Transport Agency (\$275)**

whose address for service is [evan.keating@nzta.govt](mailto:evan.keating@nzta.govt).

4. The particular parts of the submission WWL supports, the reasons for that support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




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Victoria Buchanan, PP Kevin Locke (Acting CEO)

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[victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)



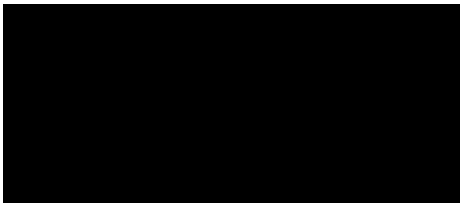
<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
Policy P.P1 (GW reference 275.011)	Support	WWL supports further consideration of the feasibility and costs of these targets.	Accept
Policy P.P2 (GW reference 275.012)	Support	WWL supports further consideration of the feasibility and costs of these targets.	Accept
Policy P.P4 (GW reference 275.013)	Support	WWL supports further consideration of the feasibility and costs of these targets.	Accept
Policy P.P12 (GW reference 275.014)	Support	WWL supports further consideration of the feasibility and costs of these targets.	Accept

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Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in support of and partially in opposition to various submissions on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. The submissions to which this further submission relates, along with the address for service of each submitter, the particular parts of the submission WWL opposes or supports, the reasons for that opposition or support, and the outcomes sought by WWL are set out in the table below.
4. WWL wishes to be heard in support of its further submission.



Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



Submitter and address	Ref	Subject	Position	Reason	Outcome
S213 Pareraho Forest Trust (caitlincarew@gmail.com)	S213.020	WH.P13	Oppose	Wellington Water opposes the addition of Schedule F sites to (f). This would not be practicable for sequencing of sub-catchments.	Reject
S226 Higgins Contractors Limited (gen.walker@pdp.co.nz)	S226.006	WH.P13	Oppose	Stormwater management strategies and requirements of Schedule 31 apply to the local authority network and state highway network (and 'stormwater' excludes discharges associated with earthworks - which are instead addressed by part 5.4). It is therefore unclear what the submitter is seeking. However WWL opposes any suggestion that runoff effects on stormwater associated with smaller site redevelopment do not have to be properly managed.	Reject
S241 Pukerua Property Group Ltd (bryce@landmatters.nz)	S241.010	WH.P13	Oppose	The submitter seeks deletion of all stormwater policies. WWL supports stormwater controls for certain land use.	Reject
S243 Land Matters Limited (bryce@landmatters.nz)	S243.004	WH.P13	Oppose	The submitter seeks deletion of all stormwater policies. WWL supports stormwater controls for certain land use.	Reject
S226 Higgins Contractors Limited (gen.walker@pdp.co.nz)	S226.014 and others	WH.R9 and other stormwater rules	Oppose	Wellington Water does not consider rule WH.R9 is unclear about which discharges it relates to, or that a new rule is necessary (and it is not clear that the kinds of discharge described by the submitter would qualify as 'stormwater'). WWL has an interest in any changes to WH.R9 or other stormwater rules proposed by this submitter.	Reject
S183 Yvonne Weeber (143 Queens Drive, Lyall Bay, Wellington 6022)	S183.237	WH.R14	Oppose	While it is not entirely clear what the submitter is seeking, WWL cannot control private cross connections where wastewater may enter the stormwater network and opposes any changes in this regard.	Reject
S241 Pukerua Property Group Ltd (bryce@landmatters.nz)	S241.027	P.P12	Oppose	The submitter seeks deletion of all stormwater policies. WWL supports stormwater controls for certain land uses.	Reject
S243 Land Matters Limited (bryce@landmatters.nz)	S243.015	P.P12	Oppose	The submitter seeks deletion of all stormwater policies. WWL supports stormwater controls for certain land uses.	Reject

S255 Woodridge Holdings Ltd (21 Severn Street, Island Bay, Wellington 6023)	S255.046	P.P12	Support	Submitter notes divergence between P.P12(a) referring to 15% copper reduction while Table 9.3 refers to 40%. WWL supports fixing inconsistencies in the plan, insofar as it is consistent with its original submission, but in this instance seeks that the reference to 15% in P12 remain.	Reject
S255 Woodridge Holdings Ltd (21 Severn Street, Island Bay, Wellington 6023)	S255.058	P.R8	Oppose	Oppose combining this rule with WH.R9 as they relate to different whitua, however it is important to ensure they are as consistent as possible (i.e. unless there are good reasons for a different approach).	Reject
S255 Woodridge Holdings Ltd (21 Severn Street, Island Bay, Wellington 6023)	S255.063	P.R13	Oppose	Oppose combining this rule with WH.R14 as they relate to different whitua, however it is important to ensure they are as consistent as possible (i.e. unless there are good reasons for a different approach).	Reject
S226 Higgins Contractors Limited (gen.walker@pdp.co.nz)	S226.017	Schedule 31	Oppose	Schedule 31 only relates to the local authority or state highway stormwater network.	Reject
S255 Woodridge Holdings Ltd (21 Severn Street, Island Bay, Wellington 6023)	S255.098	Schedule 31	Oppose	It is not necessary to provide clarity in Schedule 31 as to whether local authorities have to accept compliant discharges into their network. It is sufficient that requirements will be identified in the SMS for any connections to the stormwater network	Reject
S106 Korokoro Environment Group (Tamsin.falconer@gmail.com)	S106.003	Schedule 32	Oppose	Oppose in so far as relief sought is inconsistent with changes Wellington Water has sought to Strategic action (m) in its submission.	Reject

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2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Porirua City Council (\$240)**

whose address for service is helen.oram@porirua.govt.nz.

4. The particular parts of the submission WWL supports, the reasons for that support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




---

Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
General	Support	WWL broadly supports the intent of Porirua City Council's submission in relation to Council's analysis regarding the increased cost to ratepayers to reduce discharges and contaminants.	Accept



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2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:

**Tama Potaka, Minister of Conservation (S245)**

whose address for service is hfamilyton@doc.govt.nz.

4. The particular parts of the submission WWL opposes or supports, the reasons for that opposition or support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
All parts of the submission that seek changes to water allocation provisions in Te Whanganui a Tara	Oppose	These parts are beyond the scope of PC1. Should it be determined that they are within the scope of PC1, WWL is opposed to them, as it supports the provisions as notified.	Reject
Policy WH.P1	Support	WWL supports the additional provision regarding on-site control of stormwater, but notes that there will be some sites where this is not practicable. WWL therefore supports the additional provision, provided a practicability requirement is included.	Accept
Policy WH.P5	Oppose	The addition of NZCPS criteria and the 'smallest mixing zone possible' is inappropriate and unworkable.	Reject
Policy WH.P19	Oppose	The amendments will complicate sequencing in WWL's network discharge applications. Further, the amendments seem to apply to private cross-connections, and, if retained, should be limited to public cross-connections; and it is unclear what 'non target public' means.	Reject
Policy P.P1	Support	WWL supports the additional provision regarding on-site control of stormwater, but notes that there will be some sites where this is not practicable. WWL therefore supports the additional provision, provided a practicability requirement is included.	Accept
Policy P.P5	Oppose	The addition of NZCPS criteria and the 'smallest mixing zone possible' is inappropriate and unworkable.	Reject
Policy P.P18	Oppose	The amendments will complicate sequencing in WWL's network discharge applications. Further, the amendments seem to apply to private cross-connections, and, if retained, should be limited to public cross-connections; and it is unclear what 'non target public' means.	Reject
Rules WH.R1-R16	Oppose	The changes sought are not practicable for wastewater discharges.	Reject
Rules P.R1-R15	Oppose	The changes sought are not practicable for wastewater discharges.	Reject

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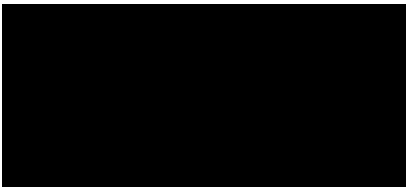
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3. This further submission relates to the submission of:

**Taranaki Whānui (S286)**

whose address for service is [kirsty@portnicholson.org.nz](mailto:kirsty@portnicholson.org.nz).

4. The particular parts of the submission WWL supports, the reasons for that support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
[victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
General	Support	WWL supports Taranaki Whānui's submission in relation to the relationship between funding and target attribute states.	Accept

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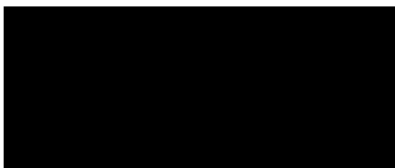
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3. This further submission relates to the submission of:

**Taumata Arowai (S116)**

whose address for service is [measures@taumataarowai.govt.nz](mailto:measures@taumataarowai.govt.nz).

4. The particular parts of the submission WWL opposes, the reasons for that opposition, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

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[victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
The entire interpretation and definitions section	Oppose	There is insufficient detail provided to understand how this would impact WWL's activities.	Reject

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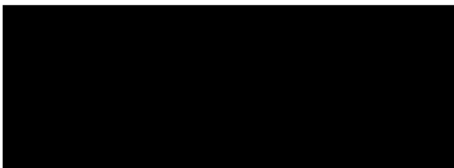
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3. This further submission relates to the submission of:

**Upper Hutt City Council (S225)**

whose address for service is geoff.swainson@uhcc.govt.nz and helen.hamilton@uhcc.govt.nz.

4. The particular parts of the submission WWL opposes or supports, the reasons for that opposition or support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.



Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

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victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
General	Support	WWL supports all those parts of UHCC's submission addressing issues related to investment for achieving the target attribute states and implementation of consents for Council-owned infrastructure.	Accept
Policy WH.P8	Oppose	WWL considers that many of the discharges fall outside the scope of the stage 2 global stormwater consent.	Reject
Policy WH.P10	Support in part	WWL agrees that the chapeau is too broad. However, WWL considers that narrowing the provision should exclude Council-owned networks as they are specifically covered elsewhere.	Accept in part
Policy WH.P18	Support	WWL agrees that more clarity would be helpful.	Accept
Policy WH.P19	Support	WWL supports increased consultation and realistic timeframes.	Accept



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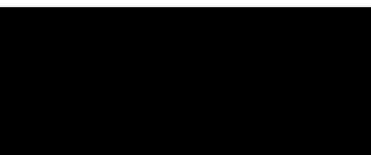
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3. This further submission relates to the submission of:

**Water New Zealand (S246)**

whose address for service is nicci.wood@waternz.org.nz.

4. The particular parts of the submission WWL opposes, the reasons for that opposition, and the outcomes sought by WWL are set out in the table below.
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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

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victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
Bullet 2 of paragraph 10	Oppose	Integration of strategies across all water services at the level of detail required for RMA processes is unachievable. This is a good idea, but not within the RMA arena.	Reject

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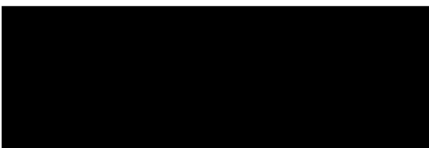
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3. This further submission relates to the submission of:

**Wellington City Council (S033)**

whose address for service is michael.duindam@wcc.govt.nz.

4. The particular parts of the submission WWL opposes or supports, the reasons for that opposition or support, and the outcomes sought by WWL are set out in the table below.
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victoria.buchanan@wellingtonwater.co.nz



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
General	Support	WWL broadly supports the intent of WCC's submission in relation to Council's analysis regarding the increased cost to ratepayers to reduce discharges and contaminants.	Accept
Policies WH.P10, WH.P14 and WH.P15	Oppose in part, support in part	WWL is neutral on whether the subject matter of these provisions best sits within regional or district planning, but considers it is crucially important to ensure there are no gaps across the four cities that would impact on WWL's ability to implement its stage 2 stormwater consent. WWL would welcome the opportunity to discuss these issues with the four city councils and GWRC.	Accept in part, reject in part

**Further Submission in support of, or in opposition to, submission on Plan Change 1 to the Natural Resources Plan for the Wellington region**


To: Greater Wellington Regional Council

Name of Further Submitter: Wellington Water Limited (**WWL**)

1. This is a further submission partially in support and partially in opposition to a submission on Plan Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**)
2. WWL has an interest in the relevant provisions of PC1 that is greater than the interest the general public has, because those provisions affect the three waters infrastructure and services for which WWL is responsible.
3. This further submission relates to the submission of:  

**Wellington Fish and Game Council (S188)**

whose address for service is [acoughlan@fishandgame.org.nz](mailto:acoughlan@fishandgame.org.nz).
4. The particular parts of the submission WWL opposes or supports, the reasons for that opposition or support, and the outcomes sought by WWL are set out in the table below.
5. WWL wishes to be heard in support of its further submission.




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Victoria Buchanan, PP Kevin Locke (Acting CEO)

8 March 2024

Address for service: Victoria Buchanan  
[victoria.buchanan@wellingtonwater.co.nz](mailto:victoria.buchanan@wellingtonwater.co.nz)



<b>Part</b>	<b>Position</b>	<b>Reason</b>	<b>Outcome</b>
All parts of the submission that seek changes to water allocation provisions in Te Whanganui a Tara	Oppose	These parts are beyond the scope of PC1. Should it be determined that they are within the scope of PC1, WWL is opposed to them, as it supports the provisions as notified.	Reject
Requests to replace the phrase “where practicable” with “where possible” or other alternatives	Oppose	WWL supports the retention of the wording as notified.	Reject
Requests for shorter interim target attribute state timeframes	Oppose	WWL opposes any shortening of the TAS timeframes as notified.	Reject
Request for a new TAS for other waterbodies (bullet point 5)	Oppose	Any new TAS needs to be written to address the overarching issues identified by WWL for rivers. It is unclear what implications a new TAS for other waterbodies would have.	Reject
Functional need and effects management hierarchy (bullet point 4)	Oppose	The need to demonstrate functional need and to apply effects management hierarchy should not apply to Council water networks.	Reject
Outcomes for nutrients (bullet point 13)	Oppose	The implications of this amendment are not clear, and it requires comprehensive monitoring.	Reject
Objective WH.O7	Oppose	No information is provided about how this will affect WWL's activities.	Reject
Objective WH.O8	Oppose	PC1 as notified provides sufficient coverage of this issue.	Reject
Objective O19	Oppose	Clause (c) does not require strengthening.	Reject
Policy WH.P5	Oppose	PC1 as notified provides sufficient coverage of this issue.	Reject
Policy WH.P7	Oppose	PC1 as notified provides sufficient coverage of this issue.	Reject
5.4.8 R151A	Oppose	Permitted activity status is appropriate for diversions that come within the rule.	Reject
Policy WH.P15	Support in part	Financial contributions need to accurately reflect the costs of the improvements and upgrades to the stormwater system, and the provisions need to incorporate flexibility.	Accept

Policies P.P10 and WH.P10	Oppose	Financial and economic constraints are an important consideration when evaluating whether something is practicable. Also, functional need should not be embedded in this provision.	Reject
Policy P.P11	Oppose	The provision should not be based on whether discharge of contaminant was 'unavoidable', or on whether there is a demonstrated functional need.	Reject
Schedule 31 b and h	Oppose	Stakeholders are part of the community and do not require a specific mention.	Reject
Schedule 32(h)	Oppose	Stakeholders are part of the community and do not require a specific mention.	Reject