

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S17 Chelsea Kershaw	S17.002	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.
S22 Tegan McGowan	S22.002	General comments - fresh water	Support	Support provisions for uplifting Te Mana o Te Wai.	Retain, refine and enhance provisions.
S24 Helen Payn	S24.002	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.
S25 Carterton District Council	S25.009	General comments - fresh water	Oppose	As stated above, CDC considers that it is inappropriate to apply the Freshwater Planning Process to provisions where freshwater is not the primary issue. CDC therefore requests that the FPP is only used for provisions in this chapter, and all other Plan Change 1 amendments are addressed via the Schedule 1 process.	Use the Freshwater Planning Process for the provisions in this chapter only, where freshwater is the primary issue, and use the Schedule 1 process for all remaining provisions.
S25 Carterton District Council	S25.010	General comments - fresh water	Support	CDC supports the inclusion of these statements, but it is unclear what purpose they serve in the RPS - better linkages with other objectives or policies would be useful to better understand how to give effect to the statements.	(Submission point in reference to - Rangitāne o Wairarapa and Kahungunu ki <i>Wairarapa Table 4, Chapter 3.4</i>) Provide better linkages between these statements and the rest of the RPS.
S28 Philippa Yasbek	S28.003	General comments - fresh water	Support	Support provisions for Te Mana o te Wai.	Retain as notified.
S31 Robert Anker	S31.001	General comments - fresh water	Oppose	The document contains the Fresh Water indicator in numerous places and whilst in some cases there is a clear linkage to NPS-FM there are many where the linkage is tenuous at best. The preamble specifies the criteria for determining the scope of a freshwater planning instrument - namely that there should be a direct relationship to freshwater quality or quantity. Council has indicated which parts of Change 1 meet at least one of the tests now required to form part of a freshwater planning instrument. This process and logic have not been applied in a consistent fashion.	Examine the document and remove the FW indicator from those parts of the document where it fails to meet the specified criteria. Those parts will not comply with the scope of a freshwater planning instrument but will fall under a Section 1 process.

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S32 Director-General of Conservation	S32.004	General comments - fresh water	Support in part	The proposed changes recognise Te Mana o te Wai, which is appropriate under the NPSFM, as is the inclusion of iwi statements. However, the structure of the proposed Objective 12 includes the iwi statements under the six principles which Te Mana o te Wai encompasses, which is not an accurate reflection of the NPSFM. This means it is unclear to plan users how those iwi statements are to be applied when implementing the RPS.	Retain as notified, except to amend Policy 12 to clarify how iwi statements are to be applied.
S35 Oliver Bruce	S35.005	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Provisions should be retained, refined and enhanced.
S37 Jennifer Van Beynen	S37.005	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
S51 Khoi Phan	S51.006	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
S53 Ellen Legg	S53.005	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai	Retain as notified.
S60 Grant Buchan	S60.006	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
S61 Patrick Morgan	S61.006	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
S62 Philip Clegg	S62.007	General comments - fresh water	Oppose in part	The proposed RPS contains references to the Fresh Water indicator in numerous places and whilst in some cases there is a clear linkage to NPS-FM there are many where the linkage is tenuous at best. Concerns that the criteria listed in the preamble for determining the scope of a freshwater planning instrument - namely that there should be a direct relationship to freshwater quality or quantity - have not been applied in a consistent way throughout Plan Change 1.	Remove references to the Fresh Water indicator from those parts of the document that don't meet the criteria specified in the preamble.

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S62 Philip Clegg	S62.015	General comments - fresh water	Support in part	This policy appears to be inconsistent with the national-level Freshwater Fisheries Regulations. The RPS should not require people to do anything that will incur additional compliance costs or liability under the Regulations.	Amend Policy 10 to resolve inconsistencies with the Freshwater Fisheries Regulations.
S71 Parents for Climate Aotearoa	S71.004	General comments - fresh water	Support	It is not acceptable to continue practices that harm our waterways and biodiversity. We support changes to ensure we are protecting our natural environment for the health and wellbeing of all.	Retain the strong provisions on freshwater, including the provisions related to Te Mana o te Wai and the environmental bottom lines related to freshwater pollution.
S73 Alicia Hall	S73.003	General comments - fresh water	Support	I support maintaining the strong provisions on freshwater, including Te Mana o te Wai, Blue Belt and preventing freshwater pollution.	Retain as notified.
S74 Finn Hall	S74.003	General comments - fresh water	Support	It would be really good if the regional council could make sure we stop polluting our waterways. Our family loves camping in summer and sometimes we are near streams and rivers that aren't safe to swim in. So I support good freshwater provisions like the important Te Mana o te Wai and looking after our environment and biodiversity better.	Retain as notified
S75 Te Aka Taura - Victoria University of Wellington Students Association (VUWSA)	S75.003	General comments - fresh water	Support	<p>Supports the maintenance of strong provisions on freshwater including the provisions related to Te Mana o Te Wai and the environmental bottom lines related to freshwater pollution. Te Tiriti should be upheld in freshwater policy through stringent pollution targets. The important relationship between freshwater and iwi must be recognised and reflected in regulation and consulting policies.</p> <p>Support for ambitious freshwater guidelines that serve a healthy community.</p> <p>Support for implementation of the National Policy Statement on Freshwater Management to work towards improving degraded water bodies and preventing further degradation of wetlands and streams.</p> <p>Supports the integration of Te Mana o Te Wai in freshwater management. This is about recognising the importance of freshwater ecosystems and communities relying on them for health and well-being.</p>	Retain as notified.

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S80 Anders Crofoot	S80.004	General comments - fresh water	Oppose	Issues would be better reviewed in their entirety in the 2024 RPS review.	Delete all the proposed amendments including all text, objective 12 and Table 4.
S92 Ruby Miller-Kopelov	S92.002	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.
S93 Isabella Cawthorn	S93.002	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.
S94 Guardians of the Bays Incorporated	S94.010	General comments - fresh water	Support	Not stated	Retain as notified
S96 Sarah (Dr) Kerkin	S96.003	General comments - fresh water	Oppose in part	The proposed RPS contains references to the Fresh Water indicator in numerous places and whilst in some cases there is a clear linkage to NPS-FM there are many where the linkage is tenuous at best. Concerns that the criteria listed in the preamble for determining the scope of a freshwater planning instrument - namely that there should be a direct relationship to freshwater quality or quantity - have not been applied in a consistent way throughout Plan Change 1.	Remove references to the Fresh Water indicator from those parts of the document that don't meet the criteria specified in the preamble.
S98 Teresa Homan	S98.006	General comments - fresh water	Support	Te Awa Kairangi and all water catchments must be protected and revitalised as priority in any district plan.	Amend provisions to address relief sought in submission.
S113 Wellington Water	S113.020	General comments - fresh water	Support in part	There is an overlap between GW and District and City Councils regarding the control of land use for water quality. This is critical for delivery of our upcoming stormwater consent application. Provisions addressing the overlap must be clear about the extent of mutual responsibilities, and avoid the risk of regional or territorial authorities individually taking less responsibility due to mutual obligations. This applies generally and particularly to Policy 14, Policy 15, Policy FW.3 Policy FW.6 and Policy 41.	Clarify district, city and regional councils' roles and functions regarding water quality, including the extent of mutual responsibilities.

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S126 Templeton Kapiti Limited (TKL)	S126.008	General comments - fresh water	Support	The TKL Land could implement the fresh water amendments.	Retain as notified.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.004	General comments - fresh water	Support	Ātiawa notes that Regional Council have earlier signalled that RPS Change 1 will include limited provisions to that give effect in part to the National Policy Statement for Freshwater Management 2020 (the NPS-FM); a separate freshwater plan change process will be publicly notified by Regional Councils on, or prior to 31 December 2024, to fully give effect to the requirements of the NPS-FM.	Ātiawa are concerned at the interim effect of RPS Change 1 where proposed provisions are dependent on other provisions that are yet to be determined through a freshwater plan change process. For example, Policy 18 and Policy 41 relate to managing freshwater in a way that achieves 'target attribute states for water bodies and freshwater ecosystems'. However, target attribute states for the Kāpiti rohe will not be set until the freshwater plan change process and Te Whaitua o Kāpiti are completed, Te Whaitua o Kāpiti will formally commence in November/December 2022.
S133 Muaūpoko Tribal Authority	S133.004	General comments - fresh water	Oppose	As currently drafted, the freshwater provisions do not adequately incorporate the local expressions of Te Mana o te Wai. A thorough review of the provisions needs to be undertaken to ensure the expressions are reflected accurately and appropriately, and achieve the desired outcomes for iwi and the region.	All freshwater provisions need to be reconsidered and updated to better incorporate Te Mana o te Wai expressions and include Muaūpoko values, attributes and outcomes.
S136 DairyNZ	S136.002	General comments - fresh water	Oppose	<p>Considers any plan change that is intended for the RPS to 'give effect to' the NPS-FM should include the other components the NPS-FM also requires of the RPS; including freshwater visions and supporting values, and related objectives and policies. An integrated process of this nature is vital for providing an informed discussion to allow the setting of clear direction for freshwater management in the region.</p> <p>A more effective and efficient process would be to delay the changes to the RPS, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1,2 and 3). Resulting in one Freshwater Planning process once when making all the</p>	Delete changes and address issues through a full review of the RPS.

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				required changes to give effect to the NPS-FM 2020, and would more appropriately give effect to the NPS-FM requirements outlined at 3.2.	
S136 DairyNZ	S136.022	General comments - fresh water	Oppose	The NPS-FM directs (at 3.2(1)) that every regional council must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region. The changes in PC1 to the RPS do not provide any greater clarity or direction on how Te Mana o te Wai applies to freshwater in the region.	Undertake further consultation to determine how Te Mana o te Wai applies to freshwater in the region.
S137 Greater Wellington Regional Council (GWRC)	S137.002	General comments - fresh water	Support in part	<p>The National Policy Statement for Freshwater Management (NPS-FM) requires the regional council to not delay and implement the NPS-FM as soon as reasonably practicable. Section 3.3(1) requires that "every regional council must develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement."</p> <p>The regional council did not include vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in Proposed RPS Change 1 due to the desire to enable a truly partnered approach to the plan change development which was ultimately constrained by time.</p> <p>A number of parties have questioned this decision and expressed their expectation that freshwater vision objectives should have been included in the Proposed RPS Change 1. The regional council now seeks to include through submissions freshwater vision (to give effect to the NPS-FM 2020) objectives for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.</p> <p>The visions in this submission have come from the whaitua processes for these whaitua, through input from community and mana whenua / tangata whenua.</p>	<p>Insert freshwater vision for Te Awarua-o-Porirua into Chapter 3.4, as shown below: Objective 12A: Freshwater vision for Te Awarua-o-Porirua</p> <p>The health and wellbeing of Te Awarua-o-Porirua and all of the waterbodies and ecosystems within Te Awarua-o-Porirua Whaitua are restored, their waters are healthy and future generations are sustained, physically and culturally. Such that within 20 years:</p> <p>(a) The harbour, waterbodies and coast are clean and brimming with life and have diverse and healthy ecosystems,</p> <p>(b) The harbour, waterbodies and coast can be used to gather and catch kaimoana and mahinga kai,</p> <p>(c) The harbour, waterbodies and coast flow naturally and with energy, attracting people to connect with them,</p> <p>(d) The harbour, waterbodies and coast are safe and accessible for people to enjoy and undertake recreational activities,</p> <p>(e) Te Awarua-o-Porirua is recognised (acknowledged and protected) as an ancestral treasure of Ngāti Toa Rangatira,</p> <p>(f) Ngāti Toa Rangatira are able to exercise its kaitiakitanga and are integral to a</p>

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					<p>partnership model for the ongoing protection of the harbour and its waterways, and(g) Land is developed, used and managed to maintain or restore natural hydrology and habitat, reduce contaminant losses and minimise creation of contaminants.</p>
<p>S137 Greater Wellington Regional Council (GWRC)</p>	<p>S137.003</p>	<p>General comments - fresh water</p>	<p>Support in part</p>	<p>The NPS-FM requires the regional council to not delay and implement the NPS-FM as soon as reasonably practicable. Section 3.3(1) requires that "every regional council must develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement." The regional council did not include vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in Proposed RPS Change 1 due to the desire to enable a truly partnered approach to the plan change development which was ultimately constrained by time. A number of parties have questioned this decision and expressed their expectation that freshwater vision objectives should have been included in the Proposed RPS Change 1. The regional council now seeks to include through submissions freshwater vision (to give effect to the NPS-FM 2020) objectives for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. The visions in this submission have come from the whaitua processes for these whaitua, through input from community and mana whenua / tangata whenua.</p>	<p>Insert freshwater vision for Whaitua te Whanganui-a-Tara into Chapter 3.4, as shown below: Objective 12B: Freshwater vision for Whaitua te Whanganui-a-TaraAll freshwater bodies in Te Whanganui-a-Tara are wai ora and estuarine areas are healthy and functioning within 100 years, including:(a) The āhua of the Korokoro, Kaiwharawhara, Te Awa Kairangi, Wainuiomata, and Ōrongorongo Awa and Parangārehu Lakes is fully restored(b) Mana Whenua are the lead agency and regulator for protection and restoration of wai ora in 20 to 50 years' time(c) Tamariki support mātua, tuākana and whānau, hapū and iwi to restore and protect awa using tools like iwi kaitiaki plans within 20 years.(d) Pakeke are active in paid mana whakahaere roles overseeing monitoring, management, and improvement of wai ora in 20 years.(e) Taiohi are active kaitiaki and kaikohikai in the wider catchment and are inducted into wai ora monitoring programmes like Ngā Mangai Waiora (ambassadors for water) within 20 years.(f) All waterbodies in Te Whanganui-a-Tara are suitable for primary contact/kaukau (swimming) by 2041.(g)</p>

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					<p>Native fish have access to move freely up and down the entire length of the catchment to complete their life cycle within 20 years.(h) Iwi can safely harvest and eat (identified species) of local mahinga kai throughout the catchment in 20 years.(i) Mahinga kai species are plentiful enough in all catchments for long term harvest including for manuhiri and to exercise manaakitanga within 20 years.(j) The mauri/mouri and life-supporting capacity of water in Te Whanganui-a-Tara enables the customary practices of Mana Whenua such as tohi, whakarite, whakawātea manaakitanga at a range of places throughout the whaitua.(k) The mana of water as a source of life is restored including regarding and respecting all waterbodies (including āku waiheke), repo (wetland) and estuaries as living entities,(l) All freshwater bodies are allowed to exhibit their natural rhythms, natural form, hydrology and character, including through a range of flows over the seasons.(m) There are sufficient flows and levels to support connectivity throughout mai i uta ki tai and between rivers and their banks to support spawning fish.(n) Key areas such as te mātāpuna (headwaters), estuaries and repo (wetland) are protected and restored so that they support healthy functioning ecosystems.</p>

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S139 Ian Gunn	S139.003	General comments - fresh water	Support in part	It is time Doc, Iwi Councils agreed a best practise management operation for the ranges to both reduce flood risk and improve water resilience.	Develop best practice management between DOC, iwi and councils to reduce flood risk and improve water resilience.
S139 Ian Gunn	S139.013	General comments - fresh water	Support	Include a permitted activity to create wetlands/bunds/dams to form a network of nature based solutions.	Require district plans to include rules that enable wetlands, bunds and dams to form a network of nature based solutions.
S141 Generation Zero Wellington	S141.007	General comments - fresh water	Support	Supports the freshwater provisions in the proposed changes to the RPS. Believe that freshwater should first and foremost be considered by the value that it gives to the community and this should be placed before any value to be gained through any extractive processes. Support the strong stance provided by the environmental bottom lines in relation to freshwater pollution and all the provisions related to Te Mana o Te Wai. We also believe that Te Tiriti should play an important role in the construction of any freshwater policy and the relationship between Māori and these bodies of water should be reflected in the delivery of those policies.	Retain as notified.
S148 Wellington International Airport Ltd (WIAL)	S148.005	General comments - fresh water	Support	There are a number of new freshwater related objectives and policies within the change to the RPS which seek to give effect to the National Policy Statement for Freshwater Management 2020 ("NPSFM"). Some of the provisions however also refer to the coastal marine area / coastal environment. WIAL is concerned that this will result in the management of the coastal resources which is inconsistent with the New Zealand Coastal Policy Statement ("NZCPS") and the remaining sections of the RPS which are not subject to this Proposal. It will also apply freshwater management concepts to the coastal marine area and the coastal environment which is not appropriate.	Any reference to the coastal marine area / coastal environment is deleted from those provisions which seek to directly give effect to the NPSFM.
S152 Michelle Ducat	S152.007	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Provisions should be retained, refined and enhanced.

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S163 Wairarapa Federated Farmers	S163.022	General comments - fresh water	Oppose	Freshwater issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024; and in a RPS Change specific to water in parallel with the NRP Change scheduled for urban whitua in 2023.	That the proposed amendments to Chapter 3.4 be deleted
S164 Megan Lane	S164.005	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Provisions should be retained, refined and enhanced.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.018	General comments - fresh water	Support	NPSFM clause 3.3(1) requires every regional council develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement. Forest & Bird notes the GWRC has not included long-term visions, but that appropriate visions could be taken and adapted from Te Mahere Wai o Te Kāhui Taiao: Greater Wellington Regional Council -- Te Mahere Wai recommendations. [Note submission references Clause 3.3(1) - NPSFM]	Include long-term visions for freshwater at the FMU level from Te Mahere Wai o Te Kāhui Taiao, insofar as these give effect to the objective and policies of the NPSFM.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.019	General comments - fresh water	Support	NPSFM clause 3.3 requires visions to be ambitious and clear on what the outcomes to be achieved are - noting that they are to be difficult to achieve but not impossible. There is currently no overarching vision for which the specific FMU visions are set to achieve. Forest & Bird notes the requirement to work with mana whenua and communities on developing FMU visions. The relevant goals within any vision objectives should all be achieved by, at most, 2040. Forest & Bird supports retaining shorter timeframes at the FMU level where these are proposed. Forest & Bird proposes an overarching vision for all FMUs in Greater Wellington to: a. address any gaps left by visions at the FMU/part of an FMU scale; b. give effect to Objective 12. [Note: submission in reference to Clause 3.3 NPS-FM]	Add a new overarching vision to apply to all FMUs in Greater Wellington as follows: "All of Greater Wellington catchment vision" By no later than 2040, in all Greater Wellington catchments:(1) Water bodies are protected, or restored to a state of good health, well-being and resilience,(2) Activities relating to water support the health, well-being and resilience of affected waterbodies,(3) The natural form and function of water bodies, including with respect to water quality, sedimentation and flows, mimics that of their natural behaviour,(4) Ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored,(5) Wetland, estuary and lagoon extent has been restored a much as practical where it has been lost, and their

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					<p>quality is protected and restored,(6) The habitat of indigenous freshwater species is protected and restored, and indigenous species are able to migrate easily within and between catchments, except where it is desirable to prevent the passage of some fish species in order to protect indigenous species, their life stages, or their habitats,(7) Food is available to be harvested from water bodies and is safe to consume,(8) People have abundant, quality opportunities to connect with and safely undertake recreational activities within or close to a wide range of water bodies,(9) There are no direct discharges of wastewater to water bodies.</p> <p>Make the required consequential amendments to specific FMU visions to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where these contain more stringent protection of the health and well-being of water bodies and freshwater ecosystems than provided for in the overarching vision</p>
<p>S167 Taranaki Whānui</p>	<p>S167.001</p>	<p>General comments - fresh water</p>	<p>Not Stated / Neutral</p>	<p>Taranaki Whānui migrated to the Wellington area in the 1820s through to 1830s. Since then, Taranaki Whānui has maintained ahi kā (permanent occupation). Taranaki Whānui established kāinga and papakāinga around the Wellington Harbour (and other areas). The traditional kāinga, papakāinga, māra kai (gardens) mahinga kai (food gathering areas) and other sites of cultural significance have now been largely subsumed by urban development.</p>	<p>Insertion of new statement of Taranaki Whānui Freshwater Vision and Te Mana o Te Wai Expression.</p>

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				<p>Yet, Taranaki Whānui remain. Migration has meant that Taranaki Whānui are now a minority within their tribal takiwā (tribal area).</p> <p>The takiwā of Taranaki Whānui extends from Turākira, to Tāpokopoko, to Papatahi, to Orongorongo and onto Remutaka. From Remutaka, up to Pareraho, to Pōkaimangumangu, across to Pipinui, to Te Rimurapa and a direct line back to Turākira.</p> <p>Taranaki Whānui has overlapping interests with Ngāti Toa Rangatira, Rangitāne o Wairarapa and Ngāti Kahungunu ki Wairarapa.</p> <p>As Ahi kā of the capital city of Aotearoa/ New Zealand, Taranaki Whānui's vision is to ensure that their members not only maintain their place within the takiwā but are thriving and prosperous. The loss of land and the fragmentation of Taranaki Whānui descendants and whānau (family group) over the decades creates significant challenges as they seek to restore the rightful place of their members and descendants.</p>	
<p>S167 Taranaki Whānui</p>	<p>S167.028</p>	<p>General comments - fresh water</p>	<p>Oppose in part</p>	<p>Taranaki Whānui note the primary purpose of amendments to the Freshwater Chapter as giving effect to the National Policy Statement for Freshwater Management 2020. In Septemeber 2021, Te Mahere Wai o Te Kāhui Taiao was developed in response to the National Policy Statement for Freshwater Management 2020 and is an articulation of Te Mana o Te Wai by mana whenua.</p> <p>In general, the proposed amendments to the Regional Policy Statement have not overtly responded to Te Mahere Wai o Te Kāhui Taiao. Further work is required to give effect to this throughout the Freshwater Chapter and other freshwater related provisions of the Regional Policy Statement. This needs to include reviewing the policies and methods associated with the Freshwater objectives of the Regional Policy Statement.</p> <p>Similarly, it is unclear how the proposed amendments have responded to other key sections of the National Policy Statement for Freshwater Management 2020, namely Section 3.4 Tangata whenua involvement.</p> <p>Taranaki Whānui wish to work in partnership with Greater</p>	<p>Ensure the proposed amendments to the Regional Policy Statement, Freshwater Chapter and other freshwater related provisions, policies and methods have overtly responded to Te Mahere Wai o Te Kāhui Taiao and have responded to key sections of the National Policy Statement for Freshwater Management 2020, including Section 3.4 Tangata whenua involvement.</p> <p>Taranaki Whānui wish to work in partnership with Greater Wellington Regional Council to identify and address the above points and identify appropriate responses to this through this and future Plan Changes.</p>

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				Wellington Regional Council to identify and address the above points and identify appropriate responses to this through this and future Plan Changes.	
S167 Taranaki Whānui	S167.031	General comments - fresh water	Not Stated / Neutral	Taranaki Whānui have provided a Freshwater Vision and Expression of Te Mana o Te Wai and is attached with this submission.	<i>[Note. Submission point refer S167.001]</i> Insertion a new provision Statement of Taranaki Whānui Te Mana o te Wai expression , draft provided in the original submission.
S168 Rangitāne O Wairarapa Inc	S168.005	General comments - fresh water	Support	In our opinion, replicating or paraphrasing the requirements of the NPS FM, in some cases inaccurately, does not provide any further assistance to plan users looking for guidance on the interpretation of national direction at the regional level. It is also likely to generate inefficiencies in future resource management processes, as those looking to assess their proposals against the relevant freshwater management framework may not have confidence that the RPS gives full effect to the NPS FM. This will result in the need for further assessment of proposals against the NPS FM, with all the inefficiencies that brings, to avoid falling foul of case law on this matter.	[Note - Decision requested concerns implementation of NPS-FM] Rangitāne asks that any provisions in the plan change that are simply a replication or paraphrase of provisions in the NPS FM are amended so that they appropriately give effect to those NPS FM provisions in terms that reflect the regional context.
S168 Rangitāne O Wairarapa Inc	S168.006	General comments - fresh water	Support in part	Rangitāne o Wairarapa strongly object to the statement in the Section 32 report that the Whaitua regions will be identified as Freshwater Management Unit's (FMU's). The Whaitua is not sufficiently fine grained for this purpose and is a form of colonisation that will not combine the management approaches that are vital to restoring our waterways and our whānau, hapū and wider community health.	Rangitāne o Wairarapa ask that the Proposed Plan change include additional provisions which clearly set out the timing and process for co-designing and incorporating FMUs into the RPS, and from there, the inclusion of mana whenua voices (as outlined in recommendation 1 of the Ruamāhanga WIP) in the freshwater visions for each FMU.
S168 Rangitāne O	S168.007	General comments - fresh water	Not Stated / Neutral	The Section 32 report states that Change 1 does not fully implement the NPS FM and that Change 1 is focused on 'objectives/visions which the NPS directs to be included in the RPS'.	It is Rangitāne o Wairarapa's view that the plan change goes further than this, and proposes a number of policies which, in title at least, seek to manage land use and development as it impacts on freshwater in 'urban'

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Wairarapa Inc					environments.
S168 Rangitāne O Wairarapa Inc	S168.009	General comments - fresh water	Not Stated / Neutral	<p>Policy 3 of the NPS FM directs that freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, rather than distinguishing 'urban development' from other forms of development.</p> <p>Section 3.5 of the NPS FM directs every regional council to make or change its regional policy statement to the extent needed to provide for 'the integrated management of the effects of use and development of land on freshwater and receiving environments'. Again, Section 3.5 of the NPS FM does not distinguish between the management approaches that should be applied to urban, rural or peri-urban development.</p>	We consider that, in order to give effect to the NPS FM, the proposed policies should provide for a te ao Māori view of how we enact kaitiakitanga (often referred to as 'integrated management' of freshwater) for all development in all areas. Holistic solutions are vital. Compartmentalising solutions have caused a lot of the issues we see today. We also note that the Operative RPS does not distinguish 'rural' from 'urban' development in this way.
S168 Rangitāne O Wairarapa Inc	S168.010	General comments - fresh water	Not Stated / Neutral	We are also concerned at Wastewater management within the RPS changes	Any wastewater solutions need to give effect to te Mana o te Wai and holistically be approached as per integrated management. We hope that this issue will be addressed in future plan changes as it hasn't been addressed here (only minor reference to sludge in Policy)
S168 Rangitāne O Wairarapa Inc	S168.011	General comments - fresh water	Not Stated / Neutral	Introducing a set of freshwater provisions for urban development only, continues to provide compartmentalised solutions and does not address integrated catchments.	<p>[Note - Submission refers to Part 4 of Schedule 1 of the RMA - FM process]</p> <p>This highlights the need for additional provisions to be added to the RPS in co-design and collaboration with mana whenua (or for the existing provisions to be amended to apply more broadly) to manage all other types of development. However, there is no specified process or timeframe as to when these provisions will be developed and incorporated into the RPS. This will result in a high degree of unnecessary procedural repetition and potential for inconsistencies in approach, as provisions are debated through separate Schedule 1 processes. There is a high risk that dealing with only one element of development in the RPS will</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					create policy loopholes and gaps which will frustrate efficient and effective decision-making.
S168 Rangitāne O Wairarapa Inc	S168.012	General comments - fresh water	Not Stated / Neutral	The further degradation of our wai is not an option, and we are concerned that the disjointed policy approach facilitates the continued degradation of our wai. This will also lead to confusion, over complication and non-compliance. Simple clear policy direction and non segregation is key to informing and educating our community and people to look after the health of our wai.	Rangitāne o Wairarapa Inc. therefore requests that the Plan Change be amended to include a set of high level but coherent, concise freshwater provisions that applies to all development.
S169 Kahungunu Ki Wairarapa	S169.002	General comments - fresh water	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S170 Te Rūnanga o Toa Rangatira	S170.001	General comments - fresh water	Not Stated / Neutral	We (the submitters) also have provided our 'Statement of Ngāti Toa Rangatira - Freshwater Vision' as part of this submission.	Insert a new 'Statement of Ngāti Toa Rangatira - Freshwater Vision' . [Note. Please refer to the original submission for details of a draft of Statement of Ngāti Toa Rangatira - Freshwater Vision]
S11 Outdoor Bliss Heather Blissett	S11.006	Freshwater introductory text	Support in part	Correction to page 30. In Upper Hutt a main Highway divides a people from the river creating a disconnect. One idea. Lift the road so that people can access the river freely and accessibly.	Change the wording from "Flood management" to "Environmental protection".
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.040	Freshwater introductory text	Support	Generally supports the 'Chapter Introductions' for Freshwater (including public access).	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S114 Fulton Hogan Ltd	S114.001	Freshwater introductory text	Support in part	This introductory text sets the scene and, at a high level, discusses resource management issues facing the region. Shortages of resources, including aggregate, is often poorly understood by the general public and planners. We request that explicit mention be included in this text to help build understanding of these issues.	In Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and: (e) recognises the role of both natural and physical resources (including the need for building materials such as aggregate) in providing for the characteristics and qualities of well-functioning urban environments; and
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.028	Freshwater introductory text	Support in part	<p>Ātiawa supports in part the overall intent of the Chapter Introduction given it provides updated reference to the NPS-FM and Te Mana o te Wai. However, Ātiawa seeks further changes to the introduction to further align wording with current legislation and to reflect best practice and approaches to freshwater management in the region. In general, the chapter introduction is outdated and the changes made are only inserting reference to the NPS-FM and Te Mana o te Wai. It is concerning that in the almost ten years since the policy statement was made operative (24 April 2013) there have been no amendments made to the context and freshwater issues in the region. Although Ātiawa acknowledges many of these issues are enduring and remain the same, some of the wording does not reflect a 2022 view of freshwater management.</p> <p>Noting that a local authority must commence a review of a provision if the provision has not been subject to review during the previous 10 years (s79, RMA). Ātiawa seeks clarity on the timing on the outstanding provisions that have not been reviewed through RPS Change 1. Ātiawa note that plan change processes are a significant draw on iwi resources and capacity. Where there is sufficient time it makes sense to review these freshwater provisions in a holistic manner, rather than a piece meal approach.</p>	Mana whenua and Regional Council work together to redraft the chapter introduction, this could be addressed as part of the plan change process to give full effect to NPS-FM by 31 December 2024.
S137 Greater Wellington Regional Council (GWRC)	S137.001	Freshwater introductory text	Support in part	Freshwater visions in the regional policy statement will drive freshwater provisions in the Natural Resources Plan at the whitua scale. A map of whitua boundaries is therefore necessary to support the freshwater visions for each whitua.	Insert a map of whitua boundaries, exactly as shown in Attachment 2 of this submission (<i>Map of whitua boundaries to be inserted in freshwater chapter introduction</i>), into the introductory text for Chapter 3.4, with the following caption: Figure 2A: Map of whitua boundaries.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S145 Wairarapa Water Users Society	S145.001	Freshwater introductory text	Oppose in part	<p>There is no time-critical imperative to review the Freshwater provision of the RPS. The only urgent requirement is the Urban Development provisions.</p> <p>The additions to the chapter introduction are symptomatic of the unnecessary haste being applied to the Plan change.</p> <p>The fact that only 2 out of 6 iwi have managed to provide an Expression of their meaning of Te Mana o Te Wai makes the plan review less than inclusive.</p> <p>The introduction should also recognise the significant community input into the Ruamahanga Whaitua and the Wairarapa Water Resilience Strategy.</p> <p>Both of these documents have been accepted by GWRC.</p>	<p>Removal of the Freshwater Chapter from this review. OR If the chapter is retained, the Introduction should recognise the Ruamahanga Whaitua Implementation Plan AND the Wairarapa Water Resilience Strategy</p>
S163 Wairarapa Federated Farmers	S163.023	Freshwater introductory text	Oppose	<p>Amendments to this text should be considered as part of planned regional plan changes in 2023 (urban whaitua) and 2024 (rural whaitua) to give effect to the NPS-FM; in addition to the scheduled review of the RPS in 2024 (and potentially an additional review of the RPS in 2023 to align with NRP changes at that time). See submission for more detail.</p>	<p>Delete the proposed amendments to the introduction.</p>
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.013	Freshwater introductory text	Support in part	<p>This provides a fairly accurate general overview. However, concerned that the margins of rivers, lakes and wetlands often fall through the cracks. These areas must also be recognised per section 6(a) of the RMA.</p>	<p>Amend the first paragraph as follows: Fresh water is integral to our health, wellbeing, livelihood and culture. Freshwater is essential for our economy and defines our landscape and sustains ecosystems. People value clean fresh water for many reasons - economic, recreational, aesthetic, ecological and cultural. It is a matter of national importance to protect wetlands, lakes, rivers, streams and their margins from inappropriate use and development.</p>
S166 Masterton District Council	S166.011	Freshwater introductory text	Support in part	<p>Rathkeale College does not discharge anymore.</p>	<p>Amend the paragraph to read: There are eight seven major discharges of treated sewage to fresh water in the region - one from the treatment plant at Paraparaumu, one from</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					Rathkeale College in Masterton , with the rest from the Wairarapa towns of Masterton, Castlepoint, Carterton, Greytown, Featherston and Martinborough.
S167 Taranaki Whānui	S167.029	Freshwater introductory text	Oppose in part	The proposed wording does not reflect the intention of Taranaki Whānui to include a Freshwater Vision and Expression of Te Mana o Te Wai through this submission process and requires subsequent amendments. Further, the issues of significance for iwi have not been revised and do not respond to the issues outlined in Te Mahere Wai o Te Kāhui Taiao, which should be adopted as the issues of significance for Taranaki Whānui.	Include Taranaki Whānui's Freshwater Vision and Expression of Te Mana o Te Wai and revise the issues of significance for iwi outlined in Te Mahere Wai o Te Kāhui Taiao.
S168 Rangitāne O Wairarapa Inc	S168.031	Freshwater introductory text	Support in part	The current text in paragraph 2 doesn't put the health and wellbeing of water bodies and freshwater ecosystems first and foremost. The language used reflects competing values i.e. "multiple resource users with differing values". Statements such as: "Māori consider fresh water to be a significant taonga (valued resource) that plays a central role in both spiritual and secular realms" implies that Māori tikanga and mātauranga is a religious endeavour. What we do is not religious, this is cultural practice from multiple generations of observing, learning and listening to our taiao. Rangitāne o Wairarapa supports the inclusion of text explaining the expressions of Te Mana o te Wai. However, having now seen the structure of the provision, we have some concerns about how our Te Mana o te Wai statement's will be implemented and incorporated into Objective 12, as explained below.	Amend the introductory text to clarify the hierarchy of obligations in Objective 2.1 of the NPS FM and to remove implications that Māori are acting within a religious realm. Add lack of integrated management of freshwater ecosystems to the list of regionally significant issues.
S16 Kāpiti Coast District Council	S16.046	Objective 12	Support	Council considers the objective appropriately gives effect to the requirements of the NPS-FM with respect to the expression of Te Mana o te Wai. Council looks forward to seeing the yet to be drafted expressions of Te Mana o te Wai from those iwi who hold mana whenua within the Kāpiti Coast District. Council notes and supports clause (d) of the Te Mana o te	Retain

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				Wai principles that makes it clear under the principle of Governance that it requires those with authority for making decisions about freshwater do so in a way that prioritises the health and well-being of freshwater now and into the future.	
S30 Porirua City Council	S30.012	Objective 12	Oppose	<p>This objective repeats the NPS-FM and adds no value to the RPS, the objective should articulate what outcomes are sought for the Wellington Region.</p> <p>It is not necessary or consistent with best practice plan making to repeat what is in higher order documents (including the RMA itself). An RPS should provide regional context for national direction. Further, the objective is too long and unwieldy.</p> <p>While Council is not directly impacted by the two mana whenua statements, Council is concerned to ensure that any new statements that are inserted into the RPS by way of submission or subsequent variation are able to be achieved and implemented. It is unclear what the intent is with the mana whenua statements and what is the intended legal status of them vis a vis the body of the objective itself. Are they intended to be objectives in their own right? There needs to be more clarity provided. The statements contain many objectives and policies within them, which would need to be examined in terms of being measurable, achievable, realistic and relevant, and within scope of the RMA. It is unclear what the status of the policies in the mana whenua statements is in respect to being referred to as being objectives. If they are intended to be objectives in their own right, then they need more work done on them to fit within the RPS; rather than read as a tack-on as they do now. The current framing that the GWRC has provided for the objective is likely to result in considerable confusion in trying to give effect to them.</p> <p>It is recommended that the GWRC promulgate a variation that provides more clarity and certainty as to what Objective 1 of the NPS-FM means within the Wellington Region and reconsiders the framing of the mana whenua objectives in this regard.</p>	<p><i>[Note: Amendment references Statement of Rangitāne o Wairarapa Te Mana o te Wai expression and Kahungunu ki Wairarapa Te Mana o te Wai expression, after Table 4, Chapter 3.4]</i></p> <p>Amend the objective so that it is clear what the outcomes sought are. These amendments should provide clarity as to the status and purpose of the iwi statements, including their weighting and status compared to the other FW objectives and how any conflicts should be managed.</p> <p>Ensure that any new statements that are inserted into the RPS by way of submission or subsequent variation are able to be achieved and implemented as above.</p>
S34 Te Kaunihera	S34.054	Objective 12	Oppose in part	Council supports the objective in principle. However, is considered unnecessary to repeat the provisions of the	Amend (c) to reflect the NPS- FM accurately.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
o Te Awa Kairangi ki Uta, Upper Hutt City Council				NPS-FM. It is also noted that the provisions included are inaccurate, and inconsistent with the wording of the NPS-FM. Clause c) may be an issue for parts of the communities, especially for those reliant on/the users of irrigation and bore water.	
S79 South Wairarapa District Council	S79.008	Objective 12	Support in part	The prioritisation of the health needs of people are supported. More work needs to be done to improve efficiency of use when GWRC makes decisions allocating takes of water. Any changes in allocation requirements for municipal supplies should be phased in over the length of the approval.	Retain as notified.
S86 Irrigation New Zealand (Irrigation NZ)	S86.001	Objective 12	Support in part	Broadly supports the hierarchy of obligations expressed in Objective 12. Notes that the hierarchy fails to regard the importance of irrigation systems and its symbiotic relationship with the health needs of the people and the submission provides further details on the importance of irrigation.	Amend to better reflect the needs of primary industries in the Greater Wellington Region.
S89 VicLabour	S89.007	Objective 12	Support	Support the structure of the three priorities in Objective 12 (Table 4), especially considering that the health and well-being of water bodies and freshwater ecosystems should always be our first priority. Without healthy waterways, we do not have healthy water, and therefore we do not have healthy people.	Retain as notified.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.041	Objective 12	Support in part	Generally supports the objectives in the 'Freshwater' chapter. However, the statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa should be recognised and provided for to ensure their expression of Te Mana o te Wai is considered appropriately when implementing the Proposed Policy Statement.	Amend Objective 12 as follows: ... And The Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa are recognised and provided for.
S113 Wellington Water	S113.005	Objective 12	Support in part	WWL supports Rangitāne o Wairarapa and Kahungunu ki Wairarapa expressing how effect will be given to Te Mana o te Wai in their respective rohe; but does not support the proposal to include the entirety of their statements of expression within Objective 12. While parts of the statements resemble material suitable for objectives (both in content and in length), it is not clear how objectives within statements within objective 12 should be applied relative to objective 12 itself or other objectives	If it is necessary to keep the iwi statements intact, then they should not sit within Objective 12. They should be housed elsewhere within the RPS in a manner that makes clear how their variety of content types (objectives, policies, statements of issues and so on) are to be applied relative to other parts of the RPS. OR, If the statements do not need to be kept intact, then the objective-type material could be retained within objective

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>elsewhere in the RPS. Further, the greater part of the statements contain material that is not suitable for objectives (either in content or in length), which more closely resembles other types of RPS content. This includes expressions of visions, issues, values, expectations, principles and so on. This far exceeds the requirements of 3.2(3) of the NPS-FM.</p> <p>It is not clear in the proposed drafting what the role is of policies that sit within statements that sit within an objective? How will applicants draft applications with confidence that they are giving effect to the RPS?</p>	12, and material of other types relocated like-with-like elsewhere within the RPS (i.e. placing policies with policies, explanations with explanations, issues with issues and so on).
S115 Hutt City Council	S115.013	Objective 12	Support in part	We support the objective, but it simply restates the objectives and principles from section 1.3 of the National Policy statement for Freshwater Management 2020 (NPS-FW). We consider that provisions of higher order national direction should not be duplicated in the RPS. Rather, appropriate objectives drafted for the regional context that give effect to national direction.	Amend Objective 12 to give effect to the NPS-FW in the regional context, rather than repeating the higher order direction.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.029	Objective 12	Support	<p>Ātiawa are supportive of Objective 12, Ātiawa are pleased the hierarchy of obligations has been included as an objective. This explicitly sets out how freshwater is to be managed in the region and is consistent with national policy direction (NPS-FM). Ātiawa also supports the inclusion of the six principles (from the NPS-FM) relating to the roles of tangata whenua and other New Zealanders in the management of freshwater (including the RPS and its implementation). It is important that these are included as an objective as this provides an expectation that freshwater must be managed in a way that is accordance with these principles.</p> <p>Ātiawa look forward to including statements from Ātiawa ki Whakarongotai at an appropriate time.</p>	Ātiawa seek that Regional Council prepare a plan change (using the Freshwater Plan Change Process) to insert Ātiawa ki Whakarongotai statements at the appropriate time.
S133 Muaūpoko Tribal Authority	S133.005	Objective 12	Oppose in part	<p>While the intent of the objective is supported, as currently drafted, it does not adequately incorporate mana/tangata whenua expressions of Te Mana o te Wai.</p> <p>Would like the opportunity to provide an expression of Te Mana o te Wai - this may be added to other iwi expressions.</p> <p>Do not consider it necessary to repeat principles in the RPS. The objective should be a local expression of Te</p>	<p>Amend the objective and incorporate local expressions into other parts of the plan to better express the elements of Te Mana o te Wai. AND</p> <p>Remove simple repetition of the NPSFM 2020, including the six principles.</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				Mana o te Wai, not repeat the NPS. The objective should also be clear that Muaūpoko has a connection to the area, alongside other iwi in the region.	
S136 DairyNZ	S136.004	Objective 12	Oppose	A more effective and efficient process would be to delay changes, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1, 2 and 3).	Delete changes and address issues through a full review of the RPS
S140 Wellington City Council (WCC)	S140.016	Objective 12	Support	Support as proposed.	Retain as notified.
S147 Wellington Fish and Game Council	S147.007	Objective 12	Support in part	<p>Strongly supports all six principles of Te Mana o te Wai and their inclusion in the RPS.</p> <p>Strongly supports the prioritisation of interests and outcomes as set out in accordance with the objective in Part 2.1 of the NPS-FM.</p> <p>The concept of Te Mana o te Wai forms the fundamental underpinning of the NPS-FM. In accordance with Part 3.2(1) of the NPS-FM, GWRC must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region. Concerned that, as drafted, Objective 12 falls short of what is required under the NPS-FM. It fails to articulate a clear objective as to what the application of Te Mana o te Wai means in the GWR and to give the overarching guidance expected from an RPS. Support the statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa. Those Statements, along with the view of the community and other stakeholders, are vital to a proper understanding and implementation of Te Mana o te Wai. However, the statement on p. 31 that these Statements "form part of [Objective 12]" creates significant potential for confusion between the Objectives and Policies outlined in the iwi Statements and those contained in the RPS itself. This is particularly the case as elements of the iwi Statements go beyond the scope of GWRC's functions.</p>	Replace Objective 12 with a single, integrated, and succinct expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the Greater Wellington Region.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				Recommends significant reconsideration of the current approach to Objective 12 with a view to the development of a single, integrated, and succinct expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the GWR.	
S163 Wairarapa Federated Farmers	S163.025	Objective 12	Oppose	Defer to the upcoming plan changes in 2023 for urban whaitua, and 2024 for rural whaitua. See submission for more details.	Delete the amendments to Objective 12.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.015	Objective 12	Support	Captures the concepts set out in the NPSFM	Retain.
S167 Taranaki Whānui	S167.030	Objective 12	Support in part	Taranaki Whānui support the inclusion of Objective 12 as required by National Policy Statement for Freshwater Management 2020, with the following wording amendments to reflect the inclusion of a Taranaki Whānui Freshwater Vision and Expression of Te Mana o Te Wai;	Amend the objective to include Taranaki Whānui, to read: "And the Statements of Taranaki Whānui , Kahungunu ki Wairarapa, and Rangitāne o Wairarapa"
S168 Rangitāne O Wairarapa Inc	S168.003	Objective 12	Support in part	While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't (i.e when developing, whose statement should be followed and who to engage for further details). As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which, for practical purposes, may be more effective if they were sitting in other parts of the RPS, such as in the policies or methods sections	We ask that the Council, working with Rangitāne o Wairarapa Inc, amend the RPS to ensure that elements currently included in Objective 12 are fit for purpose, are appropriately located within the RPS, and can be readily interpreted and applied, in order to give effect to the National Policy Statement for Freshwater Management 2020 (NPS FM).
S168 Rangitāne O	S168.004	Objective 12	Not Stated / Neutral	[Decision requested] is consistent with the principles of mana whakahaere and kaitiakitanga in the NPS FM and is required in order to give effect to Te Mana o te Wai. It is	We seek that Objective 12 is amended to provide for tangata whenua / mana whenua to be actively involved by taking a lead role in making and implementing

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Wairarapa Inc				also provided for through mechanisms such as s33 of the RMA.	decisions about freshwater.
S168 Rangitāne O Wairarapa Inc	S168.032	Objective 12	Support in part	<p>The objective as currently drafted repeats what is in the NPS FM but doesn't provide any further guidance as to how to give effect to Te Mana o te Wai in the region.</p> <p>Rangitāne o Wairarapa do not consider it is necessary or particularly helpful to simply repeat the six principles which form part of the fundamental concept of Te Mana o te Wai, as part of the regional expression of the concept.</p>	Remove the six principles of Te Mana o te Wai from the objective, as it is not necessary to repeat these here.
S168 Rangitāne O Wairarapa Inc	S168.033	Objective 12	Support in part	<p>The notified plan change is the first opportunity that Rangitāne o Wairarapa has had to fully comprehend how our statement of Te Mana o te Wai would be incorporated into the RPS. While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't. As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which may be more effective if it was sitting in other parts of the RPS, such as in the policies or methods, or potentially in the Regional Plan.</p>	Amend the plan change to ensure that the elements of Objective 12 as notified are moved into other provisions of the RPS (such as objectives, policies and methods) which more appropriately reflect the function of those elements.
S168 Rangitāne O Wairarapa Inc	S168.034	Objective 12	Support in part	<p>The notified plan change is the first opportunity that Rangitāne o Wairarapa has had to fully comprehend how our statement of Te Mana o te Wai would be incorporated into the RPS. While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't. As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which may be more effective if it was sitting in other parts of the RPS, such as in the policies or methods, or potentially in the Regional Plan.</p>	Rangitāne o Wairarapa seeks an opportunity to work with the Council to determine which elements of the Te Mana o Te Wai statement should be incorporated into Objective 12, and which elements would more appropriately be incorporated in other parts of the RPS or regional plan.
S168 Rangitāne O	S168.035	Objective 12	Support in part	<p>Rangitāne o Wairarapa are also concerned that there is no direction in this objective to implement mana whakahaere - tangata whenua should have the power and authority to make decisions on governance, management and</p>	Amend Objective 12 to provide that tangata whenua are actively involved in freshwater management and will lead decision making on strategy, management and implementation of operational initiatives related to fresh

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Wairarapa Inc				operational projects for freshwater management, as set out in the NPS FM, and provided for through mechanisms in the RMA such as s33 - transfer of powers. Freshwater is a taonga for our whānau, hapū and iwi.	water, in order to give effect to Te Mana o te Wai. Including implementing mana whakahaere as set out in the NPS-FM and provided for through s33 of the RMA.
S169 Kahungunu Ki Wairarapa	S169.003	Objective 12	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S168 Rangitāne O Wairarapa Inc	S168.0197	Objective 12	Support in part	The notified plan change is the first opportunity that Rangitāne o Wairarapa has had to fully comprehend how our statement of Te Mana o te Wai would be incorporated into the RPS. While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't. As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which may be more effective if it was sitting in other parts of the RPS, such as in the policies or methods, or potentially in the Regional Plan.	Rangitāne o Wairarapa seeks to amend part of their Te Mana o te Wai statement to remove a whakataukī and the supporting text. "A notable example of this is from the writings of Whatahoro Jury: Ko Waiōhine ko Ruamāhanga ēnei e wairua tipu mai i Tararua maunga e oranga e te iwi. These are Waiōhine and Ruamāhanga. They are like mother's milk flowing out of the Tararua mountains for the prosperity of the people. Nā Whatahoro Jury 1841-1923"
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.070	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	No comment	No relief sought
S89 VicLabour	S89.008	Statement of	Support	Support wording "joint decision-making between tangata whenua and GWRC for all decisions about our	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		Rangitāne o Wairarapa Te Mana o te Wai expression		waterbodies". Support engaging with tangata whenua at the decision-making table, and them being able to make the decisions alongside GWRC, will result in better outcomes for our waterways	
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.042	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Generally supports Rangitāne o Wairarapa Te Mana o te Wai expression.	Retain as notified.
S140 Wellington City Council (WCC)	S140.015	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Support the need for of Iwi expression of Te Mana o te Wai, but there is a need to clarify whether they have regulatory weighting	Clarify the regulatory weighting of the Iwi expression of Te Mana o te Wai.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.016	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Forest & Bird supports the inclusion of Te Mana o te Wai expressions.	Retain.
S168 Rangitāne O Wairarapa Inc	S168.002	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support in part	While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't (i.e when developing, whose statement should be followed and who to engage for further details). As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which,	We ask that the Council, working with Rangitāne o Wairarapa Inc, amend the RPS to ensure that elements currently included in Objective 12 are fit for purpose, are appropriately located within the RPS, and can be readily interpreted and applied, in order to give effect to the National Policy Statement for Freshwater Management 2020 (NPS FM).

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				for practical purposes, may be more effective if they were sitting in other parts of the RPS, such as in the policies or methods sections.	
S31 Robert Anker	S31.013	Statement of Kahungun u ki Wairarapa Te Mana o te Wai expression	Oppose	This aspect is suggesting an action which would be illegal, and it is not appropriate for GWRC to be aligning itself with KkW Policy 10. In doing so they would appear to be encouraging others to commit an offense. It is not the place of GWRC to selectively observe legislation.	Remove KkW Policy 10.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.071	Statement of Kahungun u ki Wairarapa Te Mana o te Wai expression	Support	No comment	No relief sought
S96 Sarah (Dr) Kerkin	S96.011	Statement of Kahungun u ki Wairarapa Te Mana o te Wai expression	Support in part	This policy appears to be inconsistent with the national-level Freshwater Fisheries Regulations. The RPS should not require people to do anything that will incur additional compliance costs or liability under the Regulations.	Amend Policy 10 to resolve inconsistencies with the Freshwater Fisheries Regulations.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.043	Statement of Kahungun u ki Wairarapa Te Mana o te Wai expression	Support	Generally supports Kahungunu ki Wairarapa Te Mana o te Wai expression.	Retain as notified.
S165 Royal Forest and Bird Protection Society of New	S165.017	Statement of Kahungun u ki Wairarapa Te Mana o	Support	Forest & Bird supports the inclusion of Te Mana o te Wai expressions	Retain

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Zealand Inc. (Forest & Bird)		te Wai expression			
S169 Kahungunu Ki Wairarapa	S169.005	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S11 Outdoor Bliss Heather Blissett	S11.024	Table 4	Support in part	Protecting and enhancing the health and wellbeing of water bodies and freshwater ecosystems, then take and use of water.	Swap Policy 17 and Policy 40.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.067	Table 4	Support in part	Method 36 The proposed method considered appropriate, however as no explanation has been provided for the method, Council's ability to provide comments is constrained. It is unclear whether this method is a regulatory or non- regulatory method and Council notes there are no clear regulatory mechanisms for territorial authorities to utilise. Council also notes that industry led standards may also not be best practice, or in the greater public good.	Provide an explanation for the method and develop in conjunction with submitters.
S129 Waka Kotahi NZ Transport Agency	S129.020	Table 4	Support in part	Generally supportive of Policy 45, Table 4, but it is noted that using water within work sites is essential in the way Waka Kotahi operate, maintain, and construct infrastructure. Therefore, it is necessary to clarify what 'efficiently' means in relation to water use.	Seeks that Policy 45, Table 4 be clarified to ensure the functional and operational needs of infrastructure is recognised and provided for.
S136 DairyNZ	S136.003	Table 4	Oppose	Believe a more effective and efficient process would be to delay changes to the RPS, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the	Delete changes and address issues through a full review of the RPS.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.4: Fresh water (including public access)

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1, 2 and 3).	
S163 Wairarapa Federated Farmers	S163.024	Table 4	Oppose	Defer to the upcoming plan changes in 2023 for urban whitua, and 2024 for rural whitua.	Delete Table 4 OR Amend objectives and policies in Table 4 as per details in submission and make consequential amendments to related methods.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.014	Table 4	Support	This provides a fairly accurate table setting out policy titles and lead authorities.	Retain