

CHRISTMAS EVE, CHRISTMAS DAY AND NEW YEAR'S EVE FARES

9. The actual patronage and estimated fare revenue loss on Christmas Eve, Christmas Day and New Year's Eve 2022 is summarised in the below table:

Free travel day	Patronage			Fare revenue loss (GST excl)		
	Bus	Rail	Total	Bus	Rail	Total
Christmas Eve (24th)	20,432	8,044	28,476	\$12,530	\$9,031	\$21,561
Christmas Day (25th)	7,177	6,920	14,097	\$5,063	\$9,038	\$14,101
New Year's Eve (31st)	24,176	7,759	31,935	\$15,133	\$8,586	\$23,719
Total	51,785	22,723	74,508	\$32,726	\$26,655	\$59,381



By email

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Tēnā koutou katoa

RE: Porirua Northern Growth Area Specified Development Project – Greater Wellington Regional Council Submission

The Greater Wellington Regional Council (GWRC) thanks Kāinga Ora for the opportunity to make this submission on the public notification of the Porirua Northern Growth Area Specified Development Project (SDP). |

We welcome closer engagement with Kāinga Ora as the proposal is further refined and submitted to Ministers for approval (currently planned for December 2023).

1. Summary of our views

GWRC supports the strategic and coordinated development of the Porirua Northern Growth Area. Through a coordinated, outcomes-led approach, we see opportunities to maximise benefits for the community and region, while avoiding or minimising environmental, social and cultural impacts.

Nevertheless we have concerns both about the strength and adequacy of the proposed objectives, the inherent conflict between some objectives, and also whether the aspiration of the objectives is realistically achievable given the considerable challenges, constraints and risks associated with this SDP site. We look forward to working with you and other partners to strengthen these objectives and provide confidence through further work on the Constraints and Opportunities Report that the risks can be adequately mitigated and the project objectives achieved.

2. GWRC's legislative functions relating to this proposal

We are a growing and diverse region, and it is GWRC's role to protect our environment while also meeting the cultural, social and economic needs of our communities. Our council is responsible for environment management, flood protection and land management, provision of regional parks, public transport planning and provider (through Metlink) and metropolitan bulk water supply.

A number of our statutory functions are of relevance to this proposal including:

- **Flood protection.** GWRC has regulatory control over the region's watercourses. Flood protection work ranges from developing floodplain management plans for major rivers and streams in the region, to providing flood hazard advice to developers, territorial authorities, Wellington Water, and other partner organisations on appropriate development. GWRC's flood protection activities involve partnering with communities to provide a coordinated response to circumstances and processes that impact rivers, streams, and floodplains within a wider catchment.
- **Environmental regulation.** GWRC is responsible for consenting, compliance monitoring, and enforcement functions under legislation and policy including the RMA, the National Policy Statement for Freshwater Management (NPS-FM), and GWRC's Natural Resources Plan (NRP). With regards to land management and erosion control, the RMA sets statutory responsibilities for GWRC that include controlling the use of land for the purpose of soil conservation and the avoidance or mitigation of natural hazards (including erosion and slips). GWRC also delivers on the policies and objectives set in the NRP for soil, air, land, and the coastal marine area.
- **Freshwater.** Under the NPS-FM, councils must seek to achieve minimum freshwater standards so that overall freshwater quality in a region is maintained or improved. GWRC uses a whaitua process for catchment engagement, drawing on the aspirations of mana whenua, community, landowners, and territorial authorities in a collective effort to improve the health of our waterways. GWRC serves as the provider and protector of fresh water for the region, together with Wellington Water, and monitors freshwater standards, prepares for future growth in demand, and plans for the resilience of the water supply network.
- **Biodiversity.** Biodiversity conservation and restoration is one of GWRC's core functions. The RMA requires regional councils to sustainably manage natural resources including through the protection and maintenance of indigenous biodiversity and habitats. The Regional Policy Statement (RPS) provides a statutory framework for managing indigenous biodiversity across the region and the NRP includes statutory provisions to maintain and enhance ecosystems in the coastal marine area, wetlands and the beds of lakes and rivers.
- **Regional transport.** GWRC works in partnership with Waka Kotahi/New Zealand Transport Agency, KiwiRail, and territorial authorities to plan and help fund the region's public transport network, as per the requirements set out under the Land Transport Management Act 2003. It is responsible for developing the Regional Land Transport Plan - the statutory plan that delivers the strategic framework and investment priorities for land transport in the region. GWRC (under the name Metlink) also delivers public transport services through its network of bus, rail, ferry, and Total Mobility services.
- **Emissions reduction.** While not a statutory function, as a regional authority, GWRC has an obligation to contribute towards emissions reductions goals set under the Climate Response (Zero Carbon) Act, via the national Emissions Reduction Plan. GWRC publishes a regional greenhouse gas inventory in conjunction with the region's district councils.

Through the Wellington Regional Leadership Committee, the councils in the region are developing a Regional Emissions Reduction Plan. In addition, the region must deliver on a 29% reduction in (light) vehicle kilometres traveled (VKT) by 2035, and GWRC, along with its council partners in the region, is currently developing a plan to help deliver on this.

- **Climate adaptation and resilience.** GWRC works closely with local councils through the Wellington Region Climate Change Working Group (WRCCWG) on essential adaptation and resilience activities such as preparing coastal communities for climate change. The WRCCWG is developing a regional climate change impact assessment to bring together a consistent regional evidence base of climate change risks and impacts over the next century, which will inform the development of an evidence-based regional adaptation plan. Climate adaptation and resilience activities alongside flood protection work in the region have significant implications for urban development, when considering whether development locations are resilient to natural hazards.

3. Comments on Porirua City Council Variation 1 and role of greenfield development in the region

GWRC has previously submitted on PCC's proposed Variation 1 to the Proposed District Plan, which sought to rezone land in the Northern Growth Area to Medium Density, consistent with the Medium Density Residential Standards (MDRS).

The GWRC position, reflected also in this feedback on the SDP, is that we support well-planned urban intensification which contributes to the qualities and characteristics of well-functioning urban environments. Intensification should occur in appropriate areas that are not subject to environmental constraints, to ensure that intensification does not occur at the expense of the natural environment, or exacerbate the risk of natural hazards, including as a result of climate change.

Growth within the existing urban footprint aligns with both operative and proposed RPS direction, and with what is proposed in the Future Development Strategy (FDS). Development located in and around centres and along public transport corridors supports enhanced access to public transport, walking and cycling and reduces the reliance on the private vehicle. This approach will contribute to reduced carbon emissions, mode shift and liveability outcomes. GWRC acknowledges the case for some greenfield development (as expanded on below), despite the significant increase in capacity provided for through the National Policy Statement on Urban Development (NPS-UD) Intensification Planning Instrument across the region, including in Porirua. However, GWRC wants to ensure that any proposed greenfield development will avoid or minimise the adverse effects of land use change.

In relation to the need for greenfield developments to contribute to housing capacity in the region, we also wish to point out what appears to be an interpretation error in the Public Notification Report. At page 18 of the report, under Urban Growth Strategies (s32)(1)(f), the report states that:

Work on the FDS [Future Development Strategy] and HBA [Housing and Building Development Capacity Assessment] has identified that an additional 89,000 homes

will be required within the next 30 years within the greater Wellington region. Of this figure, 65,000 homes are expected to be established on Greenfield land.

This statement suggests that greenfield developments will meet approximately 73% of the projected demand for housing. However, what the latest HBA has identified is quite different. It has identified that:

- Through infill/redevelopment (excluding greenfield), there is realisable capacity of approximately 180,000 houses in the region through to 2051 (see Table 4.7, p. 29)
- There is plan-enabled capacity in greenfield areas of 104,000 houses

In contrast, 30-year demand according to Sense Partners projections (what the FDS is using) is about 99,000 households (noting that Stats NZ project a much lower demand, at about 36,000 households to 2043).

On the basis of these numbers, there is plenty of realisable capacity to accommodate all of the region's growth without greenfield development. However, allowing for the need to provide a range of different housing typologies at a range of price points (and taking into account commercial realisable capacity), the draft FDS states that over the 30-year lifetime of the strategy, 82% of housing development will be provided for in existing urban areas in towns and cities (i.e., through infill and brownfield) and 18% will be delivered through greenfield developments.

We are concerned that one of the fundamental assumptions underpinning the proposal for an SDP is based on figures that are not current and not consistent with what is proposed in the FDS.

4. Scope of submission

Through its public notification of the proposed SDP, Kāinga Ora has requested public feedback on the 'key features' of the proposal, which set the direction for the project. The key features comprise the following:

- The **project area**, defined by geographical boundaries, is where the SDP will operate.
- The **project objectives** set the SDP direction and what it will achieve. If an SDP is established, the project objectives will guide statutory decisions under the Urban Development Act 2020 and must be considered as part of statutory decision making under the Natural and Built Environment Act 2023.
- The **project governance body** will be responsible for governing the SDP development and delivery, which could include making sure a development plan is prepared, and project objectives are achieved by the public and private sectors over the lifetime of the project.

Note that while we will comment on these key features, we will also make comment on all matters that we feel are relevant to the successful delivery of this project, and any risks that we have identified with this.

5. General remarks on proposal

Overall, GWRC supports the strategic and coordinated development of the Porirua Northern Growth Area (NGA). Through a coordinated, outcomes-led approach, we see opportunities to maximise benefits for the community and region, while avoiding or minimising environmental, social and cultural impacts. Nevertheless, we also recognise that it is important not to consider this proposed project in isolation. It is important to consider whether the benefits and outcomes realistically realisable through this project will be proportionate with the level of government investment and intervention required, or whether the same level of investment could achieve greater benefits and outcomes in a project elsewhere.

While we broadly support the proposed objectives, which are comprehensive in their scope, we do have some concerns about the lack of clarity and specificity of some of these objectives. This ambiguity makes them both hard to measure and therefore hard to hold the governance body accountable for delivery. Having clear and strong objectives will be especially critical as the SDP process allows for regional and district policy to be amended to align with the objectives of the SDP. We therefore cannot guarantee that the delivery of the SDP will be consistent with regional policies such as the Regional Policy Statement or Natural Resources Plan. This feedback is set out in more detail below but we outline some more general points in this section.

We also have questions about how realisable the intent of the objectives will be through the delivery of this project given the considerable constraints and risks associated with the SDP site (set out in section 9). As noted, there is a need to fully identify and investigate the constraints and risks, and their mitigations, in the Constraints and Opportunities Report in order to give partners the confidence that these issues can be adequately addressed through the delivery of the project.

Importance of clearly worded and measurable objectives

The project objectives are critically important as they ‘set out the key outcomes and outputs that the project aims to deliver’ (s.27(1) Urban Development Act). It is against these that the success of the project will be measured. It is therefore essential that they are clearly worded and objectively measurable. We note that in the Public Notification Report, there is some additional commentary that clarifies the meaning of some of the more ambiguous phrases such as ‘20-minute trip’ (see section 7 for more discussion on such terms). It is unclear what the status of this commentary is. Will it be included in the document setting out the key features when these are enacted through Order in Council? Or will the commentary that clarifies some of these terms have no legal standing? If the latter, we would suggest including the clarifications within the objective wording themselves.

Tension between (and within) objectives

There is an inherent tension between a number of the objectives (for example between objectives to maximise the efficient use of developable land at this site and objectives around climate resilience, protection of natural environments and mode shift). Will the project be able

to deliver on all these objectives simultaneously, or will some inevitably be ‘traded off’ against others? Historically, it has been the environment that has lost in situations where development has been the primary goal. In this whaitua/catchment, in which freshwater, estuarine and marine systems are already highly degraded (see the [Te Awarua o Porirua Whaitua Implementation Programme](#)), it would be unfortunate if this was to eventuate here also.

There are also tensions within single objectives, most notably in the case of objective 14 where the need to ‘respect’ natural environments is being explicitly ‘balanced’ against the need to use developable land ‘efficiently’.

What we would like to see emphasised more in the objectives

Sediment and run-off risks. Given the steep and challenging topography of the site, the earthworks required to create suitable building platforms and the considerable landslide hazards (noted on p.16 of Public Notification Report), along with the sensitivity of the Taupō Swamp and existing flood risk at the southern end of the site, it strikes GWRC as incongruous that the key issues of sediment and run-off from the site are not explicitly addressed in the objectives. It may be that the intent is that these risks are encompassed by objective 14, but if so, our position is that this objective is too weak, as noted above and in more detail below. While it is noted that objective 17 deals with the avoidance of natural hazards, especially in the face of climate change, what is being referred to here is the hazards that are associated with development (i.e., ‘man-made’ hazards), and particularly earthworks.

The urgent need for transport emissions reduction. The objectives do not directly address the urgent need for transport emissions reduction. This is despite the direction given by the Urban Development Act (s.5(1)(a)(v)) that urban development projects must enable low-emissions urban environments, in addition to the National Policy Statement on Urban Development (NPS-UD) which seeks urban environments that support climate resilience and reductions in greenhouse gas emissions (Objective 8 and Policy 1). We are therefore concerned that given the nature and location of the site, it will actually lead to an *increase* in transport emissions due to the challenges of achieving the level of mode shift (from private vehicle to public and active transport) that the initial project planning anticipates. We return to this point in Section 9 below.

Design principles to maximise environmental protection and climate and natural hazard resilience. We would also like to see a greater emphasis on design principles, including in relation to the use of nature-based solutions, water-sensitive urban design, and hydrological controls, and to climate-change resilience and supporting the transition to a low and zero-carbon future. At present the only reference to design is in proposed objective 6, and this is only at a high level.

It is critical at the design stage that the project shows how it will avoid development in natural wetlands and waterways in the first instance, rather than moving straight to mitigation and offsetting. This is required by the Effects Management Hierarchy in the National Policy Statement for Freshwater Management (NPS-FM), the National Policy Statement for Indigenous Biodiversity (NPS-IB) and the NRP.

Without objectives clearly setting out these expectations, GWRC's concern is that these aspects will not be prioritised. This may mean that the project will not align with national direction (e.g., the NPS-FM and the National Adaptation Plan), or regional policy such as the RPS and NRP or with the strategic direction and place-making principles proposed in the FDS. High-quality design is a key mechanism and opportunity to achieve climate-resilient, accessible, environmentally response communities.

Restoration and protection of ecological values. We would also like to see an objective that seeks to protect, enhance and restore indigenous ecosystems with significant ecological values, and which considers connectivity of ecosystems with those beyond the boundaries of the SDP (encompassed by the concept of ki uta ki tai).

Capacity to deliver on affordable housing

The Public Notice outlines that one of the key reasons why this project is being assessed for consideration as an SDP is that: '...despite significant growth in the large-scale housing development sector, Porirua and the wider region is experiencing an acute under supply of housing, characterised by a lack of affordable housing and increasing rental costs.'

Yet, none of the project's 17 objectives deal directly with affordability, aside from a reference to the development offering houses at a range of 'price points' (Objective 6). If this is part of the key rationale for the establishment of this SDP, then it is GWRC's position that it should have a greater emphasis in the objectives, with at least one objective dealing exclusively with the matter of affordable housing.

Furthermore, it needs to be recognised that given Kāinga Ora's role in this project is as the urban development project facilitator/lead, rather than as a housing developer/provider, delivery of affordable housing will be left to the market. Given the considerable challenges with this site, including but not limited to the steep terrain, cost of infrastructure provision, flood-risk mitigation requirements, and the considerable measures required to protect terrestrial ecosystems and freshwater environments, it is going to be challenging to build houses at an affordable price point. We are also unsure how the project can dictate the 'range of tenures' (Objective 6) (presumably including rentals), if the housing is to be delivered solely through the market.

6. Key features – project area

We are broadly supportive of the proposed project area. We understand that the project area can be adjusted after the project is approved, but we would like to take the opportunity to highlight that there may be a need to expand the boundaries around Pukerua Bay station and potentially also Plimmerton station to allow for better access for feeder buses (for turning circles, layby etc).

7. Key features – project objectives

In addition to some general remarks on the project objectives above, below we provide some more detailed comments on specific objectives. Cited project objectives are italicised.

Proposed project objective 1

The proposed objective states that:

A genuine partnership between local government, central government, and Mana Whenua is maintained for the duration of the project, to support the achievement of all project objectives, where:

a) the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) are given effect to in all decisions ...

We fully support this objective but note that it needs to be fully realised through actions rather than just words. We note that concerns have been raised about the proposed SDP by Ngāti Toa Rangātira, and prior to that, on the proposed Northern Growth Area itself (as noted in Section 9). Despite this, our understanding is that these concerns have not necessarily been reflected or resolved through the process as it has progressed. We hope that all partners will seriously consider any concerns raised by mana whenua as represented by Ngāti Toa Rangātira.

Proposed project objective 2

The proposed objective states that:

Residential densities across the project area support the provision of high-frequency public transport infrastructure and services, to or between Pukerua Bay and Plimmerton railway stations over time.

We support the objective to deliver residential densities that enable public transport infrastructure delivery. However, we are concerned at the reference to ‘over time’ as this suggests that this infrastructure may not be in place until later stages of development, when travel patterns will already be established. We suggest that the term ‘over-time’ be deleted.

Proposed project objective 5

The proposed objective states that:

Land use and infrastructure enables a mix of local commercial and employment opportunities.

We support the intent of this objective, but the wording could be clearer. By ‘local’, does this mean that these commercial and employment opportunities will be available within the SDP development itself, or does it mean that they will be in the wider district? If the latter, we are concerned that it may only add to issues with congestion on SH59 and transport emissions if significant mode share shift (to public and active transport) is not achieved. The accompanying commentary in the Public Notification Report (at p. 44) suggests that the wording may mean ‘within a 20-minute trip from home via walking, cycling or public transport’, this needs to be clearer.

Proposed project objective 9

The proposed objective states that:

Neighbourhoods provide an appropriate mix of land uses including community facilities and amenities, so that most people are able to safely access most of the daily social, educational, recreational, and cultural needs, and also where possible employment needs, within a 20-

minute trip from home.

We note that the wording '20-minute trip from home' would include a 20-minute trip by private vehicle, which would not align well with SDP goals to reduce emissions (see s.5(1)(a)(v) Urban Development Act, which states that urban development projects must enable low-emissions urban environments) or with the direction in the NPS-UD. We note that in the Public Notification Report, the supplementary comment is provided (presumably to explain '20-minute trip'): 'To enable people to access most of their day to day needs within a 20-minute trip from home via walking, cycling or public transport' (noting however that this commentary is provided with objective 5 rather than objective 9).

As noted in the general remarks above, it would facilitate clarity to include this definition within the objective itself, rather than in supplementary commentary that is of uncertain legal status (i.e., likely to be outside the scope of the Order in Council). We recommend that for clarity, the objective be reworded to state:

'..., within a 20-minute trip by public or active transport from home.' (or similar).

GWRC's position is consistent with that of Waka Kotahi, as noted in the commentary accompanying this proposed objective.

Proposed project objective 10

The proposed objective states that:

The project area features an integrated network of high-quality public and open spaces that cater for the needs of the community, and that is integrated with community facilities, transport routes and commercial centres.

Again, in being all inclusive of roads as well as public transport with its reference to 'transport routes', this objective does little to encourage mode shift. By definition, all greenfield developments are connected by roads. This objective should specifically refer to the need to be integrated with public and active transport modes, including being within walkable catchments.

Proposed project objective 13

The proposed objective states that:

The transport network prioritises public transport, walking and cycling with:

a) early investment to achieve travel behaviour change to contribute to less car dependence over the medium to long term

b) fast, frequent, and reliable public transport services connecting, over time, to activity nodes within the project area and wider sub-region

c) enhanced walking and cycling access to the Pukerua Bay and Plimmerton railway stations.

We fully support the intent of this objective and the prioritisation of public and active transport modes. In relation to 'b) fast, frequent, and reliable public transport services connecting, over time, to activity nodes within the project area and wider sub-region', we question whether the public transport that will be delivered will be either 'fast' or 'frequent', though certainly hope

that it will be reliable. The reality is that the service provided will be a bus that travels up the north-south spine along the western flank of the site, taking people to either the Pukerua Bay Station to the north or the Plimmerton Station to the south. Buses are by nature not especially fast, especially if they are stopping at regular intervals to pick up passengers, and the frequency that we can expect is unlikely to be any more than at 20-minute intervals between services (scheduled to align, with as little wait-time as possible, with the train timetable). Note that trains are currently running at 20-minute intervals between services, but there are plans to reduce this to 15-minute intervals in the future.

We also query the second part of this clause, in relation to ‘activity nodes’ within the project area and wider sub-region. The bus service will only be able to ensure the capacity to transport residents to activity nodes within the project area if they are located along the north-south spine of the development. Therefore, it is suggested that this needs to be addressed through one of the urban form objectives (objectives 3–6), which should state that ‘activity nodes’ are located in places along the north-south spine so that they can be serviced by public transport. In relation to activity nodes in the wider sub-region, it is unlikely that the density of the development will support dedicated routes to destinations outside the development, beyond the two train stations.

Proposed objective 14

This is perhaps the objective that gives us the most concern, as referred to in the general remarks (at 3.) above, because it seems to open the way for trading off the natural environment against the imperative for development. The proposed objective states that:

Urban development, including infrastructure design and operation, integrates with te taiao in a manner that respects the whenua, whakapapa and wai, including the mauri (life-supporting capacity) of Te Awarua-O-Porirua, Taupō Swamp and other natural watercourses and wetlands, while:

- a) recognising that the efficient use of developable land and delivery of compact form in the western region of the project area may require natural environment modifications in order to achieve other project objectives...*

The verb ‘respect’ in the statement ‘... in a manner that respects the whenua, whakapapa and wai, including the mauri (life-supporting capacity) of Te Awarua-o-Porirua, Taupō Swamp and other natural watercourses and wetlands ...’ is ambiguous. What does ‘respect’ mean in real terms and how will it be measured? Why has this verb been chosen instead of more tangible and measurable ‘protect’ or ‘protect and enhance’ or ‘prevent further degradation of’.

The ambiguity of this statement is particularly of concern in the light of the subsequent balancing clause ‘while: a) recognising that the efficient use of developable land and delivery of compact form in the western region of the project area may require natural environment modifications in order to achieve other project objectives...’.

This suggests that the already weak chapeau statement in this objective will be effectively balanced out by the imperative to use the developable land in an efficient manner. We also question how this aligns with the requirements of the NPS-FM, which requires that the health and wellbeing of water bodies (Te Mana o Te Wai) is prioritised (above the essential needs of people, followed by other uses).

We further consider this objective could result in development which is not consistent with the relevant sections of the RPS, including Proposed RPS Change 1, and with the NRP, which seek to maintain or improve the state of the region's water bodies and improve ecosystem health.

It is unclear why a sub-clause format has been taken with this objective, when there is only one sub-clause and a range of other relevant matters have not been referenced. In our view this objective should be re-formed to remove the sub-clause or clarify the intent.

Proposed project objective 16

This project objective states that:

Identify and enhance ecological corridors and buffer areas between and around areas of ecological value and integrate these into public open space.

GWRC strongly supports this proposed objective. To strengthen, we would further recommend adding the word 'protect', ('Identify, *protect* and enhance....') so that these areas receive long-term protection, rather than enhancement that could be eroded in the future.

Proposed project objective 17

This project objective states that:

Urban development in locations that are highly susceptible to moderate-or-higher severity natural hazard events is avoided, and in all other locations, the potential effects of natural hazards on urban development are mitigated.

We support the intent of this objective but consider it could be reworded to focus on natural hazard and climate resilience as an outcome. We would prefer to see the use of 'minimise' rather than 'mitigate', to be consistent with direction in Proposed RPS Change 1.

This objective should also refer to the critical role of urban design in achieving climate and natural hazard resilience, especially in the form of nature-based solutions such as generous areas of green and nature space, canopy trees and water-sensitive urban design.

8. Key features – Governance

The Public Notification documentation notes that Kāinga Ora is considering a committee appointed by the Kāinga Ora board for phase one (phase one comprises the development of 'Development Plan' to be approved by Ministers) with potentially a different governance entity established for phase two (delivery). It is proposed that the committee for the Development Plan phase include representatives of GWRC, along with representatives from Porirua City Council, Ngāti Toa Rangatira and Kāinga Ora. We support this approach and look forward to GWRC taking a governance role in Phase One of this important process.

We also note that the development of the Development Plan will require considerable technical and operational expertise, and it will be important that GWRC has the means (either through the governance committee or via a separate channel) to contribute to the planning process at the operational level.

9. Constraints and challenges of the site will make delivery on objectives

difficult

Impacts on freshwater environments, ecological health and flood risk within the whitua

We are concerned about the wider environmental impacts of urban development both within the NGA site and in the wider whitua. As part of scenario modelling to inform the Te Awarua-o-Porirua Whitua Implementation Programme, it was found that due to the challenging nature of the topography within this site, any development is likely to have significant impacts on receiving environments – in particular, Taupō Swamp and Te Awarua-o-Porirua.

Both sediment erosion and the hydrological changes that will result from changes in the catchment due to urban development would result in negative ecological effects in the receiving environment, as well as implications for flooding risk to surrounding communities. This concern is amplified by the existence of a large forestry block within the NGA which is scheduled to be harvested over the next 5 years and would exacerbate erosion and sedimentation risks. Scenario modelling as part of the Te Awarua-o-Porirua Whitua Implementation Programme found that very high levels of stormwater mitigation practices and erosion control measures would be needed to manage the expected consequences of development. This modelling and related technical work did not consider the physical feasibility or economic viability of such mitigation or the effect this would have on yields. Furthermore, while we support hydraulic neutrality from a stormwater perspective, we recommend that flood flows on and through the site are considered for up to and including the 1% annual exceedance probability (AEP) plus allowances for climate change events (e.g. in relation to peak rainfall intensities and river flows).

An additional concern relates to development in flood-prone land (in the form of low-lying areas and valleys), which has been identified in the Lucas, Skaiffe and Plimmerton Farm blocks and some areas of the Muri Road block. While it is not always practicable to avoid, a risk-based approach should be undertaken to determine the best use of land within the SDP site – this should also include consideration of emergency access and egress during flood events. However, avoidance is the preferred approach. Even though parts of the upper catchment in the SDP site may not be prone to flooding, land-use changes in this area would also impact run-off patterns and flood flows downstream of the site. Desired nature-based solutions for stormwater attenuation need to be carefully planned, designed and long-term maintenance considered to ensure they remain effective for the design life of the development.

The topography of the site is such that there are many gullies, streams and natural wetlands. These environments have important functions in the ecological health and lifecycle of aquatic and terrestrial species dependant on these environments. The Constraints and Opportunities Report identifies that the areas with the most development opportunities are those which contain sloping hills, which it suggests will require extensive infilling of gullies to flatten out. This is despite the report also mentioning that these gullies contain an extensive amount of native bush and wetland remnants, which are also said to be an opportunity for enhancing the ecological health and connectivity of the area. These potential outcomes are directly at

odds with each other, and this further highlights the tension between objectives 3-6 (Land-use, housing, and urban form) and 14-16 (Respected natural environment).

It has been noted in the Constraints and Opportunities Report that work is still underway to develop a water-sensitive urban design approach for the NGA, which was therefore not considered for the timing of this notification. Additionally, the report notes the need for trade-offs between the objectives provided in the notification. This is concerning given the challenging nature of the site and the implications any development would have on receiving environments. While the report identifies one of the key constraints being the significant amount of earthworks required to develop the terrain, it does not go further to address the environmental impacts as part of this constraint. Instead, another constraint identified is the stringency of the freshwater requirements in the NRP: particularly that the Taupō Swamp complex is designated with outstanding indigenous biodiversity value, meaning that all adverse effects should be avoided. The report reiterates that an SDP can modify a Regional Plan to align with its objectives, something which is identified as a potential opportunity in the report.

Our concerns are shared by Te Rūnanga o Toa Rangatira, who have communicated these to Kāinga Ora as part of previous processes (e.g., submissions on Variation 1 to the Proposed Porirua District Plan and Plan Change 19 to the Operative District Plan). Specifically, these concerns include the consideration of the ecological effects of the development – both within the site itself and to the wider environment. The mauri of Taupō Swamp, Te Awarua-o-Porirua, and the whānau of Hongoeka are of particular interest. Therefore, the process so far has left questions around whether enough weight is being given to the voice of mana whenua.

Delivery of public transport

GWRC supports the provision of reliable and accessible public transport (in this case a bus service) that will connect residents with the railway stations to the north and south of the SDP site. Due to the nature of the site, however, there will be some challenges which will need to be considered when the design is progressed as part of the Development Plan stage. These challenges include:

- steep topography is likely to cause accessibility challenges – it may be impractical to ensure wheelchair accessibility of bus stops and to use a wheelchair ramp safely
- steep grades will make designing a main through-route which enables a coherent bus route challenging
- additionally, the wider street network (away from the main north-south spine) needs to be navigable by buses to allow school routes to run targeted services. This will not be possible if the street network is predominantly steep culs-de-sacs
- steep grades will slow buses down, which may affect the ability to schedule convenient train connections
- street layout may force buses to go around the block to turn around at Pukerua Bay

(which is time consuming and results in poor legibility)

- steep local street layout will likely reduce people's willingness to walk any great distance to bus stops. This results in diminished stop catchment and will hinder mode shift
- difficulty in developing flat building platforms for supermarkets etc may result in increased pressure from developers to locate bus stops in poor locations, such as the back of the shop. To reduce car dependency and meet our transport emissions targets, bus infrastructure needs to be positioned to make bus travel to local centres an attractive option.

Transport emissions/VKT reduction

We are concerned that due to the nature and location of the site that the ambitious level of mode share anticipated in early planning is not realistic.

The site is some distance from existing amenities such as schools, supermarkets and other retail, sports grounds and facilities, medical facilities, churches and so on. While we understand that the objective is to have schools, a supermarket and other retail within the project site, these are unlikely to materialise until there is the density to support the investment and risk (in the case of commercial enterprises). These facilities have not yet materialised in the Aotea block development elsewhere in Porirua. This will mean that residents are likely to have to travel out of the SDP catchment for work, shopping, sports and other recreational and social activities, at least in the short to medium term.

While the project objectives anticipate a north-south connecting bus service to the railway stations to the north and south of the SDP site, without supporting measures (eg, congestion charging or increasing parking charges) this level of public transport service may not be sufficient to achieve the level of mode shift away from private vehicle use.

Furthermore, the steep topography of the site will likely be a deterrent to high levels of active mode uptake within the development – especially for bicycles, micro-mobility and wheelchairs.

In order to achieve the ambitious mode share envisaged, a broad range of interventions will be required, including those beyond the scope of the SDP itself. The design of the SDP, including mix of land use will be critical to supporting mode share, and these considerations need to guide the design and planning for the development from Day 1.

10. Final remarks

Thank you once again for the opportunity to provide our feedback on the public notification of the proposed SDP.

We look forward to working with Kāinga Ora as the proposal is further refined.

Ngā mihi nui

Daran Ponter

Chair, Greater Wellington Regional Council



Section 32 Evaluation report

for Proposed Variation 1 to Proposed Change 1 to the Regional Policy Statement for the Wellington Region

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Abbreviations and glossary

Change 1	Proposed Change 1 to the Regional Policy Statement for the Wellington Region
the Council or Greater Wellington	Wellington Regional Council also known as Greater Wellington Regional Council
Mana whenua/tangata whenua	Iwi or hapū who exercise customary authority in an identified area (Refer RMA Section 2)
Mauri	An energy or life force that mana whenua / tangata whenua consider exists in all things in the natural world, including people. Mauri binds and animates all things in the physical world. Without mauri, mana cannot flow into a person or object (Refer NRP page 27)
NPS-FM	National Policy Statement for Freshwater Management 2020
NRP	Natural Resources Plan for the Wellington Region, Operative July 2023
RMA	Resource Management Act 1991
RPS	Operative Regional Policy Statement for the Wellington Region 2013
Te Mana o te Wai	As set out in clause 1.3 of the NPS-FM
Variation 1	Variation 1 to Proposed Change 1 to the Regional Policy Statement for the Wellington Region
Wai ora	Water used for healing. (NRP page 340)
Whaitua	The geographical area of a Whaitua Committee and Whaitua Implementation Programme. There are five whaitua in the region: Te Whanganui-a-Tara, Porirua, Kāpiti Coast, Ruamāhanga, Wairarapa Coast. The whaitua areas are shown in Figure 1 .
WIP	Whaitua Implementation Programme

1.0 INTRODUCTION

Why we have prepared this report

1. Greater Wellington is proposing to amend Proposed Change 1 to the Regional Policy Statement for the Wellington Region (**'Change 1'**) through a Variation (**'Variation 1'**).
2. A Variation is an alteration to a proposed policy statement (or proposed plan, or change), prior to the policy statement or plan being approved¹. In this case, Variation 1 has been notified prior to the conclusion of the hearings on Change 1.
3. In preparing Variation 1, the Greater Wellington has considered the rationale for the changes, options for the changes, and involved mana whenua/tangata whenua partners and stakeholders in the process of the evaluation and the drafting of Variation 1.
4. This report summarises the evaluation of the proposed provisions, and the background and process information relevant to Variation 1.
5. When altering its regional policy statement, the Council must do so in accordance with the requirements of section 61 of the Resource Management Act 1991 (**RMA**). This includes the requirement to prepare the alteration in accordance with its obligation to prepare an evaluation report in accordance with section 32. Section 32 of the RMA sets out requirements for the Council in evaluating proposed alternations to its policy statement and reporting on that evaluation². This report has been prepared to comply with the requirements of Section 32.

How this is a freshwater planning instrument

6. Greater Wellington is proposing to amend Proposed Change 1 to the Regional Policy Statement for the Wellington Region (**'Change 1'**) through a Variation (**'Variation 1'**).
7. Section 80A(2) of the RMA sets out the definition of a freshwater planning instrument in the context of a variation to a proposed regional policy statement. To be considered a freshwater planning instrument, a variation must either: relate to objectives that give effect to the national policy statement for freshwater management or relate to any provisions of a regional policy statement in relation to which the regional council has decided to use the freshwater planning process.
8. Section 80A(4) of the RMA requires that Council publicly notify a freshwater planning instrument, which includes Variation 1. This must be done by December 31st 2024.
9. Variation 1 seeks to give effect to the requirement of clause 3.3 in the National Policy Statement for Freshwater Management 2020 (**NPS-FM**) by inserting long-term freshwater visions as objectives into proposed RPS Change 1. This meets the test of relating to objectives that effect to any national policy statement for freshwater management.
10. Clause 53 of Schedule 1 of the RMA sets out further requirements for variations to freshwater planning instruments (i.e., a variation to proposed RPS Change 1). Council must notify the Chief Freshwater Commissioner in writing of the need for the variation, and provide any further information requested by the Chief Freshwater Commissioner to help determine whether to accept or reject the variation.

¹ RMA Part 1, Schedule 1, clause 16A

² Section 32 is set out in full in Appendix A.

11. The Chief Freshwater Commissioner requested copies of the Variation 1 document itself as well as this s32 report to help determine whether to accept or reject Variation 1.
12. In making this determination, the Chief Freshwater Commissioner must consider:
 - a. whether the variation is needed to correct a significant defect in the freshwater planning instrument; and
 - b. whether the variation is needed for the effective functioning of the freshwater planning instrument; and
 - c. the impact that accepting the variation would have on the decision date of the freshwater planning instrument.
13. In terms of the test in clause (a), the variation would insert long-term freshwater visions that are currently missing from the proposed RPS Change 1 document and thus from the hierarchy of freshwater provisions required by the NPS-FM, which corrects a significant defect (RPS Change 1 not giving effect to clause 3.3 of the NPS-FM). These need to be inserted to ensure effective functioning of the hierarchy and thus the freshwater planning instrument, meeting the test in clause (b).
14. Variation 1 would be heard by the same freshwater planning process Panel that is hearing the submissions on proposed RPS Change 1 as part of the wrap-up hearings stream in early 2024, and so will not affect the decision date of the freshwater planning instrument.

Why the Council is varying RPS Proposed Change 1

15. The purpose of Variation 1 is to insert long-term freshwater visions as objectives into the RPS by varying Change 1 to comply with clause 3.3 of the National Policy Statement for Freshwater Management 2020 (**NPS-FM**). Clause 3.3(1) of the NPS-FM requires the Council to develop long-term visions for freshwater in its region and to include those long-term freshwater visions as objectives in its RPS. The vision objectives in the RPS will inform environmental outcomes and target attribute states in the Natural Resources Plan (**NRP**), as required by the NPS-FM³. Given the cascade of policy direction from the NPS-FM through the RPS and NRP, it is important that the vision objectives are included in the RPS before further changes to the NRP are notified.
16. The Council is in the process of developing a plan change to the NRP to partially give effect to the NPS-FM, including the setting of environmental outcomes and target attribute states. That plan change is being prepared and is likely to be publicly notified in late 2023.
17. Change 1 is still progressing through the hearings phase and decisions are not expected until mid-2024. As notified, Change 1 does not include freshwater vision objectives. The Council submitted on Change 1 seeking, among other things, the inclusion of two long-term freshwater vision objectives which were earlier draft versions of those now proposed through Variation 1. This Variation is consistent with that submission, although the objective wording has been further refined. However, to ensure a functioning cascade of provisions when the Council notifies the upcoming changes to the NRP, a variation to Change 1 is being pursued so that the freshwater vision objectives included in Variation 1 form part of the decision-making considerations in the NRP plan change process, in accordance with section 66(2)(a) of the Act.
18. At this stage, it is proposed that there will be a vision objective for each whitua included within the RPS. The priority for the development of visions has been for Te Awarua-o-Porirua and Te

³ NPS-FM 2020, clause 3.9(5)(b)

Whanganui-a-Tara as the change to the NRP in 2023 will involve the inclusion of provisions (environmental outcomes) for these two whitua. A vision is not being included for the Ruamāhanga whitua as the plan change for that whitua has not commenced yet, and therefore is not included in this Variation. Visions are not being included for the Kāpiti or Wairarapa Coast whitua as those whitua processes have not yet concluded.

What is covered in Variation 1?

19. The scope of Variation 1 is narrow compared with the broader Change 1 scope. This variation proposes the insertion of two long-term freshwater visions as objectives into Change 1 to implement the requirements of clause 3.3(1) of the NPS-FM and no other amendments to the provisions of Change 1.

How to navigate this report

20. This report is structured in two parts with Part A providing the background and context for Variation 1, and Part B providing the evaluation of the provisions that are included in Variation 1.

Part A: Context and background, including:

- Background and drivers for Variation 1 – Section 2
- Methodology in Policy evaluation for Variation 1, and key Processes informing Change 1 – Section 2
- The resource management issues addressed – Section 3
- Partnership, engagement, and outcomes during the process – Section 4 (also see Appendix D)
- Regulatory and policy context – Section 5.

Part B: evaluation of the proposed Variation 1, including:

- Approach to evaluation of the provisions including the regional context informing the evaluation – Section 6
- Summary of preferred option – Section 7
- Evaluation of appropriateness of objectives / purpose of changes – section 8.

PART A CONTEXT

21. Part A of this report sets out the background, context, process in respect of Variation 1, and defines the issues that the proposed Variation addresses.

2.0 BACKGROUND

The purpose of the RPS

22. The RPS identifies the resource management issues for the Region and the policies and methods to achieve integrated management of the natural and physical resources of the Region. Section 62 of the RMA sets out the required contents of an RPS.
23. The RPS implements national direction for the Wellington Region and directs subsidiary RMA documents – regional and district plans.
24. The current RPS for the Wellington region became operative on 24 April 2013 superseding the first 1995 RPS.

RPS Change 1

25. In August 2022, GWRC publicly notified Proposed Change 1 to the RPS to give effect to the NPS-UD 2020 and give partial effect to the NPS-FM 2020. Change 1 includes significant new direction on freshwater, climate change, urban development, indigenous ecosystems, and integrated management.
26. Change 1 is in part a freshwater planning instrument, proceeding through the freshwater planning process, and in part a non-freshwater planning instrument, proceeding through the standard Schedule 1 plan change process. As such, Change 1 is being heard by two different hearings panels. A hearings panel appointed under the RMA by the Council, and a freshwater hearings panel convened by the Chief Freshwater Commissioner under part 4 of Schedule 1 to the RMA.
27. Change 1 is currently undergoing hearings, which are scheduled to be complete in early 2024. Submissions on RPS Variation 1 are intended be heard as part of the proposed RPS Change 1 freshwater hearings process.

National direction as a driver for Variation 1

28. National policy statement direction has prompted these alterations to the RPS and has been a primary influence on the scope, timing, processes, and approach. An outline of the regulatory and policy context, including the key content from NPS-FM and other relevant national policy direction, is provided in Section 5.0. The key driver for variation 1 is clause 3.3(1) of the NPS-FM.

Policy evaluation for Variation 1

29. Section 32 of the RMA requires the Council to prepare an evaluation report for the Variation that sets out the process and results of what is proposed, including:
 - Examining the extent to which the objectives of the Variation are the most appropriate way to achieve the purpose of the RMA; and
 - Containing a level of detail relevant to the scale and significance of the environmental, economic, social and cultural effects that would result from implementation of the Variation; and
 - Summarising all advice concerning the Variation received from iwi authorities under the relevant provisions of Schedule 1 and the response to that advice, including any provisions intended to give effect to the advice.
30. The detailed requirements of Section 32 are provided in Appendix A – Section 32 RMA.
31. In identifying and assessing the proposed objectives, and other reasonable options, Greater Wellington adopted a range of evaluation techniques. This included:
 - Partnership and engagement with external parties (refer Section 4.0) including informal briefings and feedback, structured engagement, and formal consultation under the Triennial Agreement; and
 - Considering options and outcomes with Greater Wellington Regional Councillors in workshops and working groups.
32. In general, desktop analysis and qualitative assessment were the primary techniques used to complete this Section 32 analysis. Further information on the approach to policy evaluation for Variation 1 is provided in Part B.

Processes informing Change 1

Statutory process

33. The proposed objectives contained in Variation 1 seek to give effect to clause 3.3(1) of the NPS-FM. They seek to amend that part of Change 1 that is a freshwater planning instrument. As an amendment to a freshwater planning instrument, the relevant statutory process for Variation 1 is the RMA Schedule 1 Part 4 Freshwater Planning Process (the streamlined process for provisions related to freshwater management).
34. Consequently, the long-term freshwater visions are a component of a freshwater planning instrument under RMA Section 80A and will follow the freshwater planning process.

Natural Resources Plan and Whaitua Implementation Programmes in response to NPS-FM

35. The NPS-FM requires the Council to include objective(s) in the RPS which describe what Te Mana o te Wai means in our region, and to develop freshwater visions as part of giving effect to Te Mana o te Wai⁴, and include these in the RPS as objectives⁵. The concept of Te Mana o te Wai is the central pillar of the NPS-FM. This concept must flow through the RPS into both regional and district plans.
36. Greater Wellington has responded to the earlier NPS-FM (2014) with two major parallel regional planning processes. One process involved reviewing the operative regional plans and moving them into a single regional plan, the Natural Resources Plan, which became operative on 28 July 2023.
37. The second process, the development of Whaitua Implementation Programmes (WIP), is a direct response to the NPS-FM. There are five whaitua which collectively cover the geographical extent of the Wellington Region. Each whaitua has a Whaitua Committee tasked with developing a WIP, which is a report that includes recommendations for regulatory and non-regulatory proposals for the future of land and water management within that whaitua.
38. The purpose of the WIP is to set resource limits and drive place-based (whaitua) implementation in partnership with mana whenua/tangata whenua and communities, providing a local response to the NPS-FM. The WIPs are completed for three whaitua (Ruamāhanga, Te Awarua-o-Porirua, and Te Whanganui-a-Tara), with two still to come (Kāpiti and Wairarapa Coast).
39. The five whaitua are shown in Figure 1. The approach and documented reports endorsed for the whaitua include a process to define the issues, undertake modelling/scientific work to support the consideration of issues, and recommendations for identified objectives:
 - Te Whaitua te Whanganui-a-Tara Implementation Programme, September 2021⁶
 - Te Mahere Wai o Te Kāhui Taiao: A Mana Whenua implementation plan to return mana to our freshwater bodies⁷
 - Te Awarua-o-Porirua Whaitua: Whaitua Implementation Programme, Te Awarua-o-Porirua Whaitua Committee, April 2019⁸
 - Te Awarua-o-Porirua Whaitua Implementation Programme: Ngāti Toa Rangatira statement⁹

⁴ Clause 3.2(2)(b) of the NPS-FM

⁵ Clause 3.3 of the NPS-FM

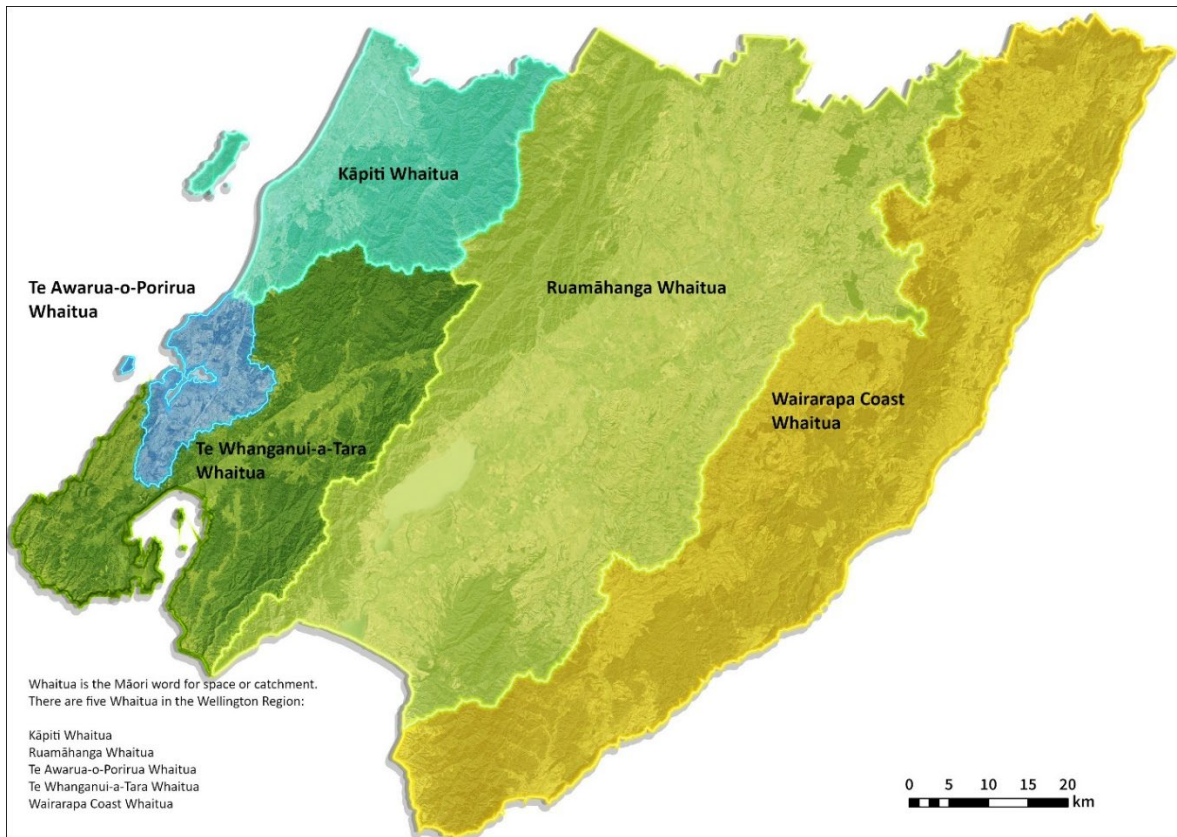
⁶ https://www.gw.govt.nz/assets/Documents/2021/12/Te-Whaitua-te-Whanganui-a-Tara-Implementation-Programme_web.pdf

⁷ https://www.gw.govt.nz/assets/Documents/2021/12/te_mahere_wai_20211028_v32_DIGI_FINAL.pdf

⁸ <https://www.gw.govt.nz/assets/Documents/2021/11/Te-Awarua-o-Porirua-Whaitua-Implementation-Programme.pdf>

⁹ <https://www.gw.govt.nz/assets/Documents/2021/12/ngatitoataopwhaituastatement-v2.pdf>

Figure 1: Whaitua of the Wellington region



40. Variation 1 to the RPS is to include freshwater visions (as objectives) for two whaitua (Te Awarua-o-Porirua and Te-Whanganui-a-Tara) as part of the cascade of provisions required from the RPS Te Mana o te Wai objective (Objective 12 in Proposed RPS Change 1) to NRP limits, targets, and rules.

3.0 RESOURCE MANAGEMENT ISSUES

Scope of Variation 1 and reliance on national identification of resource management issues

41. Variation 1 updates Change 1 to the RPS to respond to the NPS-FM direction in clause 3.3(1).
42. The NPS-FM was developed by central government in response to specific national resource management issues. It is necessary for Greater Wellington to implement national policy statements on the basis that the relevant resource management issues have already been identified, analysed, and responded to in the development of that national direction. This report does not duplicate that assessment and instead addresses that national direction in the regional context.

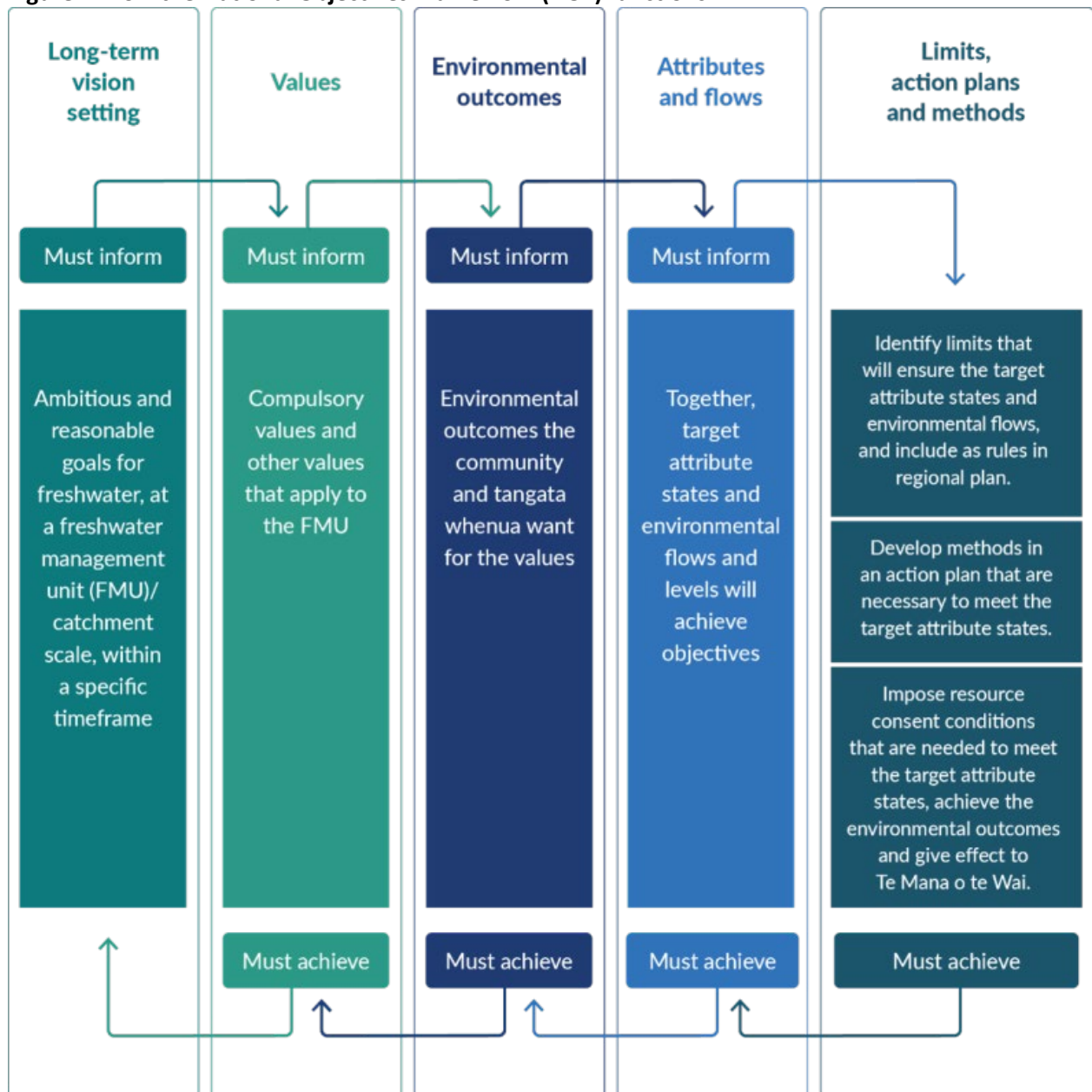
Degradation of freshwater

43. The state of our waterbodies, and the shift to restore them is outlined in the WIPs. The causes of this degradation are complex and many, as are the solutions. In very simple terms there has been inadequate control of land use activities and change, and of the discharge of contaminants. This is highlighted in the urban sector where stormwater quality controls have been inadequate, wastewater overflows are common, as is stream loss to urban subdivision. These issues are not the

only issues in respect of the degradation of freshwater however they are highlighted, because the focus of this RPS change is on the interface between urban development and freshwater.

44. To achieve the Region's objectives for Te Mana o te Wai as directed by the NPS-FM, a more directive regulatory approach, along with a range of non-regulatory methods is required in the RPS (and subsequent RMA plans). The long-term freshwater visions are a key part of this regime, as target attribute states and environmental outcomes which will be set and included in the NRP will need to be set in a way that seeks to achieve the long-term freshwater visions¹⁰.
45. Figure 2 below shows where long-term freshwater visions fit in to the broader framework of provisions required by the NPS-FM 2020¹¹.

Figure 2: How the National Objectives Framework (NOF) functions



¹⁰ National Policy Statement for Freshwater Management 2020, clause 3.9(5)(b)

¹¹ [Guidance on the National Objectives Framework of the NPS-FM](#)

4.0 PARTNERSHIP, ENGAGEMENT AND OUTCOMES

46. A summary of partnership and engagement in developing Variation 1, and the outcomes that have contributed to the development of Variation 1, is provided in this section.
47. The limited scope of Variation 1 has resulted in a focused engagement programme with targeted consultation and involvement of mana whenua/tangata whenua, territorial authorities, Ministers, and central government departments, and in accordance with the consultation process agreed in the triennial agreement under the Local Government Act. There are no customary marine title groups in the Wellington Region. The upcoming Schedule 1 process provides an opportunity for wider stakeholder and community consultation through submissions, further submissions, and the hearings process.
48. The feedback and outcomes from the consultation to date are reflected in the evaluation of the preferred option are summarised in this report.

Previous consultation

49. In addition to the targeted engagement undertaken in the preparation of Variation 1, the Council has drawn on information provided in the whitua process. This is an efficient approach to consultation and engagement acknowledging the resource constraints and demands for consultation on many of our partners, stakeholders and the community. The RMA also provides for previous consultation to be used for RMA purposes where that separate consultation has been advised to also be for RMA matters¹².
50. General public engagement in the preparation of this Variation was not undertaken by the Council. The long-term freshwater visions are based on statements from the relevant WIPs, which were produced as part of the years-long whitua process, which engaged with tangata whenua and the wider community and which was informed by an understanding of the history or, and environmental pressures on the whitua area as required by clause 3.3 of the NPS-FM¹³.

Statutory consultation

51. Schedule 1 of the RMA requires that, during the preparation of a proposed policy statement, the Council shall consult:
 - The Minister for the Environment;
 - Other Ministers of the Crown who may be affected by the policy statement;
 - Local authorities who may be affected;
 - The tangata whenua of the area, through iwi authorities;
 - Any customary marine title group in the area;
 - In accordance with the Council triennial agreement under the LGA 2002.
52. In developing Variation 1, the Council engaged with representatives of Ministers of the Crown (through Department officials), territorial authorities, and mana whenua/tangata whenua partners as required by Schedule 1 and the triennial agreement and as set out further below.
53. As anticipated by Clause 3A of RMA Schedule 1, the Wellington Regional Triennial Agreement (2019-2022)¹⁴ contains specific clauses on the consultation process to be followed during a change or review of the RPS, which were followed in respect of Variation 1:

¹² RMA Schedule 1, clause 3C.

¹³ NPS-FM 2020, clause 3.3(3)(b)

¹⁴ [Wellington Regional Triennial Agreement 2019-2022](#) clause 5.3, as referenced in Clause 3A of Schedule 1

- Greater Wellington will make available to all territorial authorities, for discussion and development, a draft copy of any change to the RPS.
- Territorial authorities shall have no less than 30 working days to respond to the proposal.
- Greater Wellington agrees to consider fully any submission and representation on the proposal.

54. A draft version of Variation 1 was provided to mana whenua/tangata whenua, territorial authorities, and relevant Ministers on 15 May 2022, with a request for feedback by 27 July 2022. There are no groups in the Wellington Region holding customary marine title. The draft Variation 1 was sent to:

- Greater Wellington Regional Council's six mana whenua/tangata whenua partners:
 - a. Ngā Hapū o Ōtaki
 - b. Taranaki Whānui
 - c. Ngāti Toa Rangatira
 - d. Ngāti Kahungunu
 - e. Ātiawa ki Whakarongotai
 - f. Rangitāne
- The following Ministers:
 - a. Minister of Conservation
 - b. Minister for the Environment
 - c. Minister for Primary Industries
- The seven territorial authorities within the Wellington Region
- Wellington Water (given their key role on implementing the Variation and future plan changes).

Mana whenua/tangata whenua

55. Greater Wellington mana whenua/tangata whenua partners have an instrumental role to play in developing freshwater visions for the RPS, as directed by the NPS FM. For the two whaitua covered by Variation 1, the mana whenua/tangata whenua partners are Ngāti Toa Rangatira and Taranaki Whānui (through PNBST). None of the other four mana whenua partners provided feedback.
56. Officers have discussed Variation 1 with Ngāti Toa Rangatira. The evolving thinking on long-term freshwater visions within Te Runanga o Toa Rangatira has been a key driver of the direction Greater Wellington has taken.
57. The initial thinking by officers from both the Council and the Runanga was that Ngāti Toa Rangatira would provide their own long-term freshwater vision that would sit alongside the Greater Wellington drafted one. The Runanga vision would speak to the specific Ngāti Toa aspirations for freshwater, while the Council vision would speak to the broader community aspirations for freshwater.
58. This thinking evolved, especially as Variation 1 meetings progressed. The most recent thinking by Ngāti Toa is that they will not provide a long-term freshwater vision to sit alongside the Greater Wellington-drafted one.
59. Officers from Te Runanga o Toa Rangatira provided feedback on versions of the long-term freshwater visions that were redrafted following feedback from the other stakeholders. This feedback primarily consisted of wording changes, but also included a new clause relating to resilience to the effects of climate change.
60. Due to time constraints and a lack of appropriate planning experts, Taranaki Whānui was not able to be involved in the preparation of Variation 1. Officers specifically sought feedback on draft

wording for a freshwater vision for Te Whanganui-a-Tara based on the WIP and Te Mahere Wai. No feedback was received.

Territorial Authorities & Wellington Water

61. Given the small scale of Variation 1, engagement with Territorial Authorities and Wellington Water consisted of sending the draft long-term freshwater visions to the various territorial authority and Wellington Water planning teams and requesting feedback by a set date.
62. Feedback on the draft Variation 1 was received from Porirua City Council and from Wellington Water. No other councils provided feedback.
63. Porirua City Council's comments were detailed and highly useful. The comments included suggested redrafting. Porirua City Council's comments focused on four areas: clarity of wording; the timeframe in which to achieve the objective; the physical state and function of Te Awarua o Porirua; and the relationship between the freshwater visions and other provisions in the RPS.
64. Some but not all the feedback from Porirua City Council has been incorporated into the drafting of the visions. Generally, feedback was incorporated if it added more precise or refined wording or addressed oversights and unintentional problems created by the original draft wording.
65. More detail on whether specific aspects of Porirua City Council's feedback was incorporated in the proposed objectives is provided in Appendix B, along with explanation as to why or why not.
66. Wellington Water Limited expressed support for the visions as drafted, while raising some minor points around clarity of drafting. The feedback was incorporated into the redrafted visions.

Central government

67. Draft versions of Variation 1 were sent to the relevant Ministers listed above. Responses were received from the Department of Conservation and from Fisheries New Zealand on behalf of the Ministry for Primary Industries. The former was supportive, and the latter had no specific feedback.

Councillors

68. The draft of Variation 1 was taken to a Council workshop and discussed with Councillors, some of whom provided feedback. Councillors sought specific reference to economic uses of water, the criticality of the Hutt catchment as a drinking water supply, fishing, natural flows, reference to the long-term Te Pūtake vision in the Whaitua Te Whanganui a Tara Implementation Programme, and a translation of the objectives into te reo Māori.
69. All these requested amendments have been adopted into the final wording of the Variation, except for the requested translation of the objectives into te reo Māori.
70. Translating the objectives into te reo Māori raises several questions as to how these objectives would work alongside the ones in English, and how subtle nuances in the translation would work. This raises the risk of a 'Treaty of Waitangi' issue where there are two subtly different versions of the same text.
71. This issue has been discussed at other Councils in the region, and the conclusion reached has been that inserting a te reo Māori translation of plan provisions create a risk to definitive interpretation of those provisions.
72. The other requested amendments would help to accurately reflect the content of the whaitua implementation programmes and so are beneficial amendments.

5.0 REGULATORY AND POLICY CONTEXT

73. This section contains a summary of the main documents that have guided the development of Variation 1. The separate evaluation in Part B provides any further regulatory context where relevant to the evaluation of that specific proposal.

74. The matters considered by the Council in preparing Variation 1 are summarised below and include:

- RMA: The purpose and principles in Part 2 of the RMA;
- Greater Wellington Regional Council functions under section 30 of the RMA;
- The requirements for RPS under sections 59 to 62 of the RMA
- Environmental management documents recognised by iwi authorities
- National Policy Statements prepared under the RMA
- This section 32 evaluation.

Resource Management Act 1991

75. Regional policy statements must be prepared in accordance with the provisions of Part 2 of the RMA.

76. The purpose of the RMA, as per section 5 of the Act, is:

(1) The purpose of this Act is to promote the sustainable management of natural and physical resources.

(2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and

(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

77. Matters of national importance, contained in section 6 of the Act, are as follows:

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

(a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:

(b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:

(c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:

(d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:

(e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:

(f) the protection of historic heritage from inappropriate subdivision, use, and development:

(g) the protection of protected customary rights:

(h) the management of significant risks from natural hazards.

78. Other matters, contained in section 7 of the Act, are as follows:

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

(a) the preservation kaitiakitanga:

(aa) the ethic of stewardship:

(b) the efficient use and development of natural and physical resources:

(ba) the efficiency of the end use of energy:

(c) the maintenance and enhancement of amenity values:

(d) intrinsic values of ecosystems:

(e) [Repealed]

(f) maintenance and enhancement of the quality of the environment:

(g) any finite characteristics of natural and physical resources:

(h) the protection of the habitat of trout and salmon:

(i) the effects of climate change:

(j) the benefits to be derived from the use and development of renewable energy.

79. Section 8 provides direction relating to the Treaty of Waitangi, which is as follows:

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

80. The provisions of the Variation have been developed in accordance with the provisions in Part 2 including the matters of national importance (Section 6), other matters (Section 7) and the Principles of the Treaty of Waitangi (Section 8).

81. Section 30 of the RMA sets out the functions of regional councils which, of particular relevance, include:

(a) the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region:

(b) the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance:

(ba) the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in relation to housing and business land to meet the expected demands of the region:

82. The provisions of the Variation have been developed in accordance with these functions in section 30 of the RMA.

National Policy Statement for Freshwater Management

83. The NPS-FM came into force on 3 September 2020, replacing the NPS-FM 2014 (as amended in 2017). The NPS-FM sets the direction for freshwater management in New Zealand through the framework of Te Mana o te Wai. Te Mana o te Wai is described as the fundamental concept for the NPS-FM (at clause 1.3), recognising that protecting the health of freshwater protects the health and wellbeing of the wider environment. Te Mana o te Wai has a hierarchy of obligations that prioritises: First, the health and wellbeing of water bodies and freshwater ecosystems; Second, the health needs of people (such as drinking water); Third, the ability of people and communities to provide for their social, economic, and cultural wellbeing, now and in the future.

84. Regional councils are directed under the RMA to give effect to the requirements of the NPS-FM when developing a proposed regional policy statement¹⁵. The Council is required to prepare the Variation in accordance with the NPS-FM under section 61 of the RMA. The NPS-FM requires freshwater quality to be maintained (where it meets stated environmental outcomes) or improved over time (where it does not meet stated environmental outcomes) and includes a National Objectives Framework for achieving this. Councils must notify regional policy statements to implement the NPS-FM by 31 December 2024.

85. Clause 3.3(1) of the NPS-FM requires:

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

86. Clause 3.3 of the NPS-FM states that:

3.3 Long-term visions for freshwater

(1) 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.

¹⁵ Sections 55 and 62, RMA

(2) Long-term visions:

(a) may be set at FMU, part of an FMU, or catchment level; and

(b) must set goals that are ambitious but reasonable (that is, difficult to achieve but not impossible); and

(c) identify a timeframe to achieve those goals that is both ambitious and reasonable (for example, 30 years after the commencement date).

(3) Every long-term vision must:

(a) be developed through engagement with communities and tangata whenua about their long-term wishes for the water bodies and freshwater ecosystems in the region; and

(b) be informed by an understanding of the history of, and environmental pressures on, the FMU, part of the FMU, or catchment; and

(c) express what communities and tangata whenua want the FMU, part of the FMU, or catchment to be like in the future.

87. Variation 1 meets the requirements of clause 3.3 of the NPS-FM.
88. The draft long-term freshwater visions are set a catchment level and include a timeframe of 2100. This is ambitious but reasonable as required by clause 3.3(2)(b), in that it sets a vision for an environmental state that is restored to the highest degree possible, but doing so will take several decades given the degradation that is 'baked in' to current urban forms and land uses.
89. The long-term freshwater visions proposed in Variation 1 meet the requirement of clause 3.3(3)(a) in that they are written to reflect the aspirations of communities and tangata whenua that were developed through the relevant whitua processes, using wording from the WIPs where possible. The whitua processes were multi-year engagement processes.
90. The long-term freshwater visions proposed in Variation 1 meet the requirements of clause 3.3(3)(b) in that they are informed by the unique pressures of the two catchments and the history of development that has led to the current states. In both catchments urbanisation and urban development are the primary pressures, which is the reason for the long-term 2100 timeframe in the visions. The current urban form and the degradation it causes is 'baked in' and will take time to undo.
91. The long-term freshwater visions proposed in Variation 1 meet the requirement of clause 3.3(3)(c) in that they reflect the aspirations in the WIPs.

Iwi authority planning documents

92. As part of the Te Awarua-o-Porirua and Te Whanganui-a-Tara whitua processes, two iwi planning documents were developed that give a voice to tangata whenua/mana whenua aspirations for freshwater:
 - Te Mahere Wai o Te Kāhui Taiao – A Mana Whenua whitua implementation plan to return mana to our freshwater bodies (2021) by Te Rūnanga o Toa Rangatira and Taranaki Whānui ki te Upoko o te Ika for Greater Wellington Te Pane Matua Taiao.
 - Te Awarua-o-Porirua Whitua Implementation Programme: Ngāti Toa Rangatira Statement (2019) by Ngāti Toa Rangatira.
93. Both documents contain statements of aspirations throughout, which were used to inform the drafting of the long-term freshwater visions – in particular, the long-term statements in the He wai mō ngā whakatupuranga section of Te Mahere Wai.

Whaitua Implementation Programmes

94. The Whaitua Implementation Programmes for Te Awarua-o-Porirua and Te Whanganui-a-Tara are key documents. Throughout the WIPs are expressions of aspirations for fresh water that have been used in the development of these long-term freshwater visions.
95. As with the iwi authority planning documents referenced above, the WIPs contain statements of aspirations and values throughout that informed the original drafting of the long-term freshwater visions.
96. The Te Awarua o Porirua WIP does not include a long-term freshwater vision. The original drafting extrapolated a vision from a series of values statements that worded in aspirational future-focused language¹⁶. The following statements were used as a basis for the draft Te Awarua o Porirua long-term freshwater vision:
- a. The harbour, streams and coast can be used to gather and catch kaimoana and mahinga kai for food.
 - b. The harbour, streams and coast are clean and brimming with life and have diverse and healthy ecosystems.
 - c. The harbour, streams and coast are safe and accessible for people to enjoy and undertake recreational activities.
 - d. The harbour, streams and coast flow naturally and with energy, attracting people to connect with them.
 - e. Te Awarua-o-Porirua is an ancestral treasure of Ngāti Toa Rangatira.
97. The wording in the original draft visions was left mostly unchanged from these statements in the WIP but has since been amended to reflect feedback received from Porirua City Council and Ngāti Toa Rangatira.
98. The Te Whanganui a Tara WIP has an explicit long-term freshwater vision, but this is very high level. Throughout the WIP are several overlapping statements referring to a desired future state with more detail, and these were used as basis for the wording in the visions.
99. By contrast, Te Mahere Wai contains explicit long-term visions¹⁷:
- a. All freshwater bodies in Te Whanganui-a-Tara are wai ora within 100 years.
 - b. All estuarine areas are healthy and functioning within 100 years.
 - c. The āhua (natural character) of the Korokoro, Kaiwharawhara, Te Awa Kairangi, Wainuiomata, and Ōrongorongo awa and Parangārehu Lakes (Parangārahu Lakes is also an acceptable spelling alternative) is fully restored in the long term.
 - d. Pēpē can be baptised in at least three wai ora associated with their whānau in the long-term.

¹⁶ Te Awarua o Porirua Whaitua Implementation Programme, page 18.

¹⁷ Te Mahere Wai, page 41

- e. Taiohi can access water in Te Whanganui-aTara for whakarite (preparing for an important activity/event) and whakawātea (cleansing).
- f. Mana Whenua are the lead agency and regulator for protection and restoration of wai ora in 20 to 50 years' time.

100. These statements were blended in with similar statements from the WIP to produce the draft visions, which have since been reworded following feedback from Te Runanga o Toa Rangatira.

PART B EVALUATION OF THE PROPOSED CHANGE

101. Part B of this report focuses on the proposed objectives in Variation 1 and is structured as follows:

- An outline of the evaluation approach
- A summary of the preferred option (i.e., the proposed Variation 1)

102. As Variation 1 is limited to objectives, and does not propose any policies, there is no requirement to undertake an evaluation of the appropriateness of any provisions (s32(1)(b) and section 32(2) of the RMA) and the objectives themselves are assessed under section 32(1)(a) – that is, whether they are the most appropriate way to achieve the purpose of the RMA.

6.0 APPROACH TO EVALUATION OF THE OBJECTIVES

103. This section of the report first sets out the regional context for the evaluation of Variation 1 and then describes the approach that was taken to that evaluation. The evaluation approach is described in two steps:

- A general overview, including how the scale and significance of the alterations are relevant to the level of evaluation
- The assessment of the appropriateness of the proposed objectives.

104. The findings from the evaluation using this approach are set out in Section **Error! Reference source not found.** and Section **Error! Reference source not found.**

Overview of Evaluation approach

105. The overall approach adopted in evaluating the proposals and options for Variation 1 followed accepted practice in policy evaluation, guided by specific requirements of RMA Section 32.¹⁸ The process involved the following steps:

- Identifying the requirements of the NPS-FM to define the scope of Variation 1
- Identifying the outcomes of the Whaitua processes relevant to Variation 1
- Working directly with mana whenua/tangata whenua partners, to the extent possible, to identify interests, process, and timing
- Developing objectives based on the issues and aspirations in the WIPs and mana whenua/tangata whenua submissions on RPS Change 1
- Formal consultation with mana whenua/tangata whenua, territorial authorities, and other statutory organisations on the draft Variation 1
- Further review of draft objectives based on feedback received
- Document evaluation (this report)
- Finalise the proposal.

¹⁸ Refer MfE: A guide to section 32 of the Resource Management Act. [A guide to section 32 of the Resource Management Act | Ministry for the Environment](#)

106. Section 32(1)(c) of the RMA requires that the evaluation of proposed alteration to the regional policy statement contains a level of analysis commensurate to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the Variation.
107. Based on this, the scale and significance of anticipated effects associated with this proposal are identified below:

Criteria	Scale/Significance	Comment
Rationale for undertaking the change now	Medium	<ul style="list-style-type: none"> Alterations are required to give effect to clause 3.3 of the NPS-FM The setting of freshwater visions in the RPS is a key step that must occur to inform changes to the NRP, including the setting of environmental outcomes, as required by clause 3.9(5)(b) of the NPS-FM.
Degree of effect relative to status quo and national direction - Freshwater	Medium	<ul style="list-style-type: none"> Alterations are required to be made to the RPS to give effect to the NPS-FM. Alterations to the RPS are as anticipated by the NPS-FM and aligned to the outcomes of the relevant whitua processes. The development of long-term freshwater visions aligned to Te Mana o te Wai and the RPS provisions to support this, is a step change in resource management compared to the operative RPS, in that it sets the health of freshwater bodies and freshwater ecosystems as the priority. Direction to Territorial Authorities in relation to their role in freshwater management (in the NPS-FM) is a step change from the current approach, which designates freshwater as a regional council-only issue.

108. Overall, the proposed alterations are of a medium scale and significance but are anticipated and directed by national direction.
109. The alterations will assist in addressing long standing resource management issues and will be aligned to provisions anticipated by national direction and regional strategic documents.
110. Considering the medium scale and significance of the proposed alterations, the following section outlines the approach to evaluating those alterations.

Assessment of appropriateness of objectives

111. Section 32(1)(a) of the RMA requires an evaluation of the extent to which the objectives are the most appropriate way to achieve the purpose of the RMA.
112. For the purpose of the section 32 evaluation, an 'objective' can be either the actual objectives proposed in the Variation, or where there are no objectives, the purpose of the Variation. In the case of Variation 1, the proposal is to add two new objectives to the RPS. As such, this report evaluates the appropriateness of the proposed objectives.
113. The appropriateness has been assessed with reference to the following criteria¹⁹:

¹⁹ These criteria are adapted from the MfE guide to section 32 ([A guide to section 32 of the Resource Management Act | Ministry for the Environment](#)) and practice developed in undertaking section 32 evaluations.

- **Relevance:** Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose of the RMA?
- **Usefulness:** Will the objective guide decision-making? Does it meet sound principles for writing objectives (does it clearly state the anticipated outcome)?
- **Reasonableness:** What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified mana whenua / tangata whenua and community outcomes?
- **Achievability:** Can the objective be achieved with tools and resources available, or likely to be available, to the Council or those implementing the RPS?

114. The evaluation is provided in the tables below. This evaluation of proposed alterations should be read alongside the proposed alterations themselves, which are outlined in the Variation 1 document.

115. As Variation 1 only contains objectives, no assessment of provisions (policies, rules, methods) is required.

7.0 SUMMARY OF PREFERRED OPTION

Summary – preferred option

116. New objectives are required as the existing RPS does not give effect to clause 3.3(1) of the NPS-FM 2020. Clause 3.3(1) of the NPS-FM directs that the Council must develop long-term visions for freshwater in its region and include those as objectives in the RPS. The Council is required to amend its RPS no later than 31 December 2024 to give effect to the NPS-FM, and in any case must do so 'as soon as reasonably practicable'. It is clear from clause 3.3 that the freshwater visions must be included as objectives in the RPS, so other options in terms of including the visions as other provisions has not been considered.

117. The NPS-FM sets out a clear process for making these alterations, with the setting of long-term visions in the RPS for freshwater being a critical step before subsequent changes to the regional plans (i.e. setting environmental outcomes, identifying values, and setting target attribute states). The visions were not included in Change 1 to the RPS, as the scope and nature of the visions was being discussed with mana whenua. A variation to Change 1 to include these visions will mean that the forthcoming NRP changes will need to 'have regard to' the vision objectives in accordance with s66(2) of the RMA.

118. The wording of the proposed objectives is based on recommendations of the Whaitua Implementation Programmes, and working with mana whenua/tangata whenua on the specific response in the RPS in relation to the NPS-FM.

119. The proposed objectives comply with clause 3.3(2) of the NPS-FM 2020 in that they apply at a catchment level and set goals and timeframes that are ambitious but reasonable, in that achieving the desired state of water will take several decades given the 'baked-in' degradation resulting from the current urban environment.

Relevant existing provisions amended

120. This Variation will add 2 new objectives in the following section of the RPS:

- Section 3 issues, objectives and summary of policies and methods to achieve the objectives in the RPS:
 - Section 3.4 – Fresh water (including public access)

8.0 EVALUATION OF APPROPRIATENESS OF OBJECTIVES

Long-term freshwater vision evaluation – appropriateness of the long-term freshwater visions as objectives

Long-term freshwater visions
<p>Insert new Objective TAP: Long-term freshwater vision for Te Awarua-o-Porirua</p> <p><u>By the year 2100 Te Awarua-o-Porirua harbour, awa, wetlands, groundwater, estuaries and coast are healthy, wai ora, accessible, sustainable for future generations, and:</u></p> <ol style="list-style-type: none"><u>1. The practices and tikanga associated with Te Awarua o Porirua are revitalized and protected; and</u><u>2. Mahinga kai are abundant, healthy, diverse and can be safely gathered by Ngāti Toa Rangatira and served to Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and</u><u>3. Have restored and healthy ecosystems that support an abundance and diversity of indigenous species, and have a natural water flow and energy that demonstrate kei te ora te mauri (the mauri of the place is intact); and</u><u>4. Provide for safe access for people and communities to enjoy a range of recreational activities including fishing, fostering a strong connection to these waterbodies; and</u><u>5. Are taken care of in partnership with Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa as kaitiaki for the mana of Te Awarua-o-Porirua as a taonga; and</u><u>6. Are resilient to the impacts of climate change; and</u><u>7. The use of water and waterways provide for social and economic use benefits, provided that such use does not compromise the health and well-being of waterbodies and freshwater ecosystems or the take and use of water for human health needs.</u>
<p>Insert new Objective TWT: Long-term freshwater vision for Te Whanganui-a-Tara</p> <p><u>By the year 2100 a state of wai ora is achieved for Te Whanganui-a-Tara in which the harbour, rivers, lakes, wetlands, groundwater, estuaries and coast are healthy, accessible, sustainable for future generations, and:</u></p> <ol style="list-style-type: none"><u>1. The practices and tikanga associated with Te Whanganui-a-Tara are revitalized and protected; and</u><u>2. Mahinga kai are abundant, healthy, diverse and can be safely gathered by Taranaki Whānui and Ngāti Toa Rangatira and served to Taranaki Whānui and Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and</u><u>3. Have mauri/mouri that is nurtured, strengthened and able to flourish and restored natural character, have a natural water flow, and ecosystems that support an abundance and diversity of indigenous species; and</u>

<p>4. <u>Provide for the safe access and use of all rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of recreational activities including fishing, fostering an appreciation of and connection to these waterbodies; and</u></p> <p>5. <u>Are taken care of in partnership with Taranaki Whānui and Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa and Taranaki Whānui that respects the mana of Te Whanganui-a-Tara and the whakapapa connection with Taranaki Whānui and Ngāti Toa Rangatira; and</u></p> <p>6. <u>Are resilient to the impacts of climate change; and</u></p> <p>7. <u>The use of water and waterways provide for social and economic use benefits, provided that such use does not compromise the health and well-being of waterbodies and freshwater ecosystems or the take and use of water for human health needs.</u></p>			
Intent of alterations:			
To give effect to NPS-FM clause 3.3(1) for Long-term visions for freshwater.			
The intent is to add long-term freshwater visions for two whaitua (Te Awarua-o-Porirua and Te Whanganui-a-Tara) as objectives in the RPS.			
Other objective options:			
The NPS-FM is directive. Long-term visions must be included as objectives in the RPS. The status quo is not viable as it would not give effect to the NPS-FM. Using the drafting in Greater Wellington’s submission is problematic in that it was not drafted with mana whenua input and does not hold statutory weight. The latter is critical for the upcoming notification of a change to the regional plan to give effect to the NPS-FM, as long-term freshwater visions will be needed to ensure a functioning hierarchy.			
	Preferred option Use new long-term freshwater visions drafted with stakeholders and mana whenua	Alternative option Use GW-drafted long-term freshwater visions drafted in RPS submissions	Status quo Do not add new long-term freshwater visions as objectives.
<i>Relevance:</i>			
Addresses the relevant resource management issue?	The NPS-FM addresses significant freshwater degradation issues. Including freshwater visions as objectives in the RPS will give effect to clause 3.3 of the NPS-FM and is a key part of addressing these issues by setting a clear outcome for what is to be achieved in each whaitua.	The NPS-FM addresses significant freshwater degradation issues. Including freshwater visions as objectives in the RPS will give effect to clause 3.3 of the NPS-FM and is a key part of addressing these issues by setting a clear outcome for what is to be achieved in each whaitua.	Status quo does not address freshwater issues to the extent required by the NPS-FM or anticipated in the WIPs.
Gives effect to national direction?	Yes - specifically gives effect to Clause 3.3 of the NPS-FM.	Yes - gives effect to Clause 3.3 of the NPS-FM but does so too late to ensure a functioning hierarchy prior to the	No - does not give effect to the NPS-FM.

		notification of the upcoming regional plan change.	
<i>Usefulness:</i>			
Will provide clear direction to decision makers and territorial authorities?	Direction is provided for the preparation of both Regional and District Plans as required by the NPS-FM. This direction is relatively high level at the long-term freshwater vision level, with more specificity added by a wider suite of RPS objectives (both operative and proposed in Change 1).	Direction is provided for the preparation of both Regional and District Plans as required by the NPS-FM. However, the direction would not be in place and hold statutory weight prior to the notification of the upcoming regional plan change.	The existing provisions are inadequate to give effect to the NPS-FM and provide clear direction to decision makers.
Will it impose an unreasonable cost and disruption to the community?	<p>The provisions will impose significant costs spread out over the long term (compared with the status quo) to the regional council, territorial authorities, and resource users during the transition phase. These costs are not explored here, as they are covered in the s32 reports for proposed RPS Change 1 and the upcoming regional plan change.</p> <p>However, there are long term benefits for the community in terms of providing a clear vision for the future health of fresh water in the region. The government considered the costs and benefits in developing the NPS-FM and considered the costs to be justified. Costs associated with the preferred option for the Greater Wellington Region are consistent with, not additional to, the NPS-FM.</p>	<p>The provisions will impose significant costs spread out over the long term (compared with the status quo) to the regional council, territorial authorities, and resource users during the transition phase. These costs are not explored here, as they are covered in the s32 reports for proposed RPS Change 1 and the upcoming regional plan change.</p> <p>However, there are long term benefits for the community in terms of providing a clear vision for the future health of fresh water in the region. The government considered the costs and benefits in developing the NPS-FM and considered the costs to be justified. Costs associated with the preferred option for the Greater Wellington Region are consistent with, not additional to, the NPS-FM.</p>	The status quo does not impose unreasonable costs immediately; however, it does not give effect to the NPS-FM so will perpetuate the costs of poor freshwater quality. Retaining the status quo will simply delay and inflate the cost and disruption to both the environment and the community which is unavoidable in implementing the NPS-FM. There are also potential legal costs of retaining the status quo as the Council would not be meeting its statutory requirements.
Can direction be reasonably implemented?	Yes, through regulation in regional and district plans, as well as non-regulatory methods.	Yes, through regulation in regional and district plans, as well as non-regulatory methods.	The status quo can be reasonably implemented through the existing RPS.

<i>Achievability:</i>			
Can be achieved with tools and resources available, or likely to be available, to Greater Wellington Regional Council or those implementing the RPS?	<p>Freshwater visions are required to be <i>goals that are ambitious but reasonable (that is, difficult to achieve but not impossible)</i> and within a <i>timeframe to achieve those goals that is both ambitious and reasonable</i>.</p> <p>Given the aspirational nature of the long-term freshwater visions and the significant degree of change required, the long timeframe is reasonable, as it will take some time to change the urban environmental practices in the catchments.</p>	<p>Freshwater visions are required to be <i>goals that are ambitious but reasonable (that is, difficult to achieve but not impossible)</i> and within a <i>timeframe to achieve those goals that is both ambitious and reasonable</i>.</p> <p>Given the aspirational nature of the long-term freshwater visions and the significant degree of change required, the long timeframe is reasonable, as it will take some time to change the urban environmental practices in the catchments.</p>	The status quo can be implemented but will not achieve the NPS-FM objectives.

Overall comment on the preferred option being the most appropriate

121. The NPS-FM requires long-term visions for freshwater in the region to be embedded in the Regional Policy Statement.
122. Section 8 of this report has described and evaluated the appropriateness of the proposed objectives.
123. The objectives were developed working with mana whenua/tangata whenua partners, and external stakeholders. A formal consultation period generated constructive feedback on a draft document and influenced the form of the proposed Variation 1. Input from interested stakeholders will continue through the submissions and hearings process.
124. Variation 1 will help implement the NPS-FM 2020 national direction, and in doing so will provide clarity to RMA decisions in the Wellington Region and ensure the appropriate planning hierarchy is in place prior to the notification of NRP changes later in 2023.
125. Overall, the objectives in the preferred option are the most appropriate way to achieve the purpose of the RMA.

9.0 REFERENCES

126. This report includes relevant references in footnotes throughout the report.
127. In addition to the specific references provided in footnotes, the following materials were also used in the preparation of Change 1 and Section 32 Evaluation Report:
 - All relevant Acts, National Policy Statements, National Environmental Standards and Regulations
 - Greater Wellington Regional Council regional plans and strategies, regional policy statements
 - Regional plans of other regional councils, and city, district plans within Wellington region.

Appendix A – Section 32 RMA

32 Requirements for preparing and publishing evaluation reports

(1) An evaluation report required under this Act must—

(a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and

(b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—

(i) identifying other reasonably practicable options for achieving the objectives; and

(ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and

(iii) summarising the reasons for deciding on the provisions; and

(c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

(2) An assessment under subsection (1)(b)(ii) must—

(a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—

(i) economic growth that are anticipated to be provided or reduced; and

(ii) employment that are anticipated to be provided or reduced; and

(b) if practicable, quantify the benefits and costs referred to in paragraph (a); and

(c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

(3) If the proposal (an amending proposal) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—

(a) the provisions and objectives of the amending proposal; and

(b) the objectives of the existing proposal to the extent that those objectives—

(i) are relevant to the objectives of the amending proposal; and

(ii) would remain if the amending proposal were to take effect.

(4) If the proposal will impose a greater or lesser prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition

or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.

(4A) If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must—

(a) summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and

(b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.

(5) The person who must have particular regard to the evaluation report must make the report available for public inspection—

(a) as soon as practicable after the proposal is made (in the case of a standard, regulation, national policy statement, or New Zealand coastal policy statement); or

(b) at the same time as the proposal is notified.

(6) In this section,—

objectives means,—

(a) for a proposal that contains or states objectives, those objectives:

(b) for all other proposals, the purpose of the proposal

proposal means a proposed standard, statement, national planning standard, regulation, plan, or change for which an evaluation report must be prepared under this Act

provisions means,—

(a) for a proposed plan or change, the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change:

(b) for all other proposals, the policies or provisions of the proposal that implement, or give effect to, the objectives of the proposal.

Appendix B – Feedback on draft RPS Variation 1

The following tables provide a summary of the feedback received during the development of Variation 1, and the officer responses including where this is reflected in proposed Variation 1.

Overarching/general comments

Party	Provision	Summary of Feedback Received	Response	New draft provisions
Minister of Conservation	Whole variation	<p>We have already submitted in support of the two Whaitua freshwater visions that were included in proposed RPS Change 1. In particular, our submission considered that the proposed visions were consistent with the National Policy Statement for Freshwater 2020, and appropriately recognised Te Mana o te Wai.</p> <p>This remains the case for the two further proposed Visions, and I support them being notified for inclusion into the RPS. I do not seek any changes, recognising the process that has been followed to develop them with iwi and the local communities.</p>	Support noted.	<p>By the year 2123³⁰ Te Awarua-o-Porirua harbour, rivers^{awa}, wetlands, groundwater, estuaries and coast are thriving^{healthy}, wai ora, accessible, sustainable for future generations, and provide for:</p> <ol style="list-style-type: none"> The practices and tikanga associated with Te Awarua o Porirua are revitalized and protected; and Mahinga kai are abundant, healthy, diverse and can be safely gathered by Ngāti Toa Rangatira and served to Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and The gathering and harvesting of nourishing kaimoana and mahinga kai that can be served to manuhiri/guests by Ngāti Toa Rangatira and the local community, reviving cultural practices and traditions. Have Rrestored and rich^{healthy} ecosystems that support an abundance and diversity of indigenous species, are brimming with life and have a natural water flow and energy that demonstrate kei te ora te mauri (the mauri of the place is intact); and within the harbour, streams, wetlands, estuaries and coast. Provide for Ssafe access for people and communities to enjoy a range of recreational activities including fishing, fostering a strong connection to these waterbodies; and Are taken care of in partnership with Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa as kaitiaki Recognition of and respect for the mana of Te Awarua-o-Porirua as a taonga; and of Ngāti Toa Rangatira and the integration of its significance into the region's freshwater management framework. Are resilient to the impacts of climate change; and The use of water and waterways provide for social and economic use benefits, provided that such use does not compromise the health and well-being of waterbodies and freshwater ecosystems or the take and use of water for human health needs.
Porirua City Council	Objective TAP: Long-term freshwater vision for Te Awarua-o-Porirua	<p>Overall, we are generally supportive of the intent of Objective TAP but think that the wording needs to be changed to ensure that it sets out achievable and measurable goals and provides clearer direction for lower-order Resource Management Act (RMA) documents.</p> <p>Clarity of wording While Porirua City Council recognises the intent of the wording used is to reflect the language used in Whaitua Implementation Programmes and what may be used by the community more generally, within an RMA context the current wording of the objective is unclear and may lead to interpretation and implementation issues.</p> <p>The current drafting uses words such as "thriving", "brimming", "rich", "fostering" and "strong connections" These terms are unclear when used within an RMA framework. For example, the word 'brimming' has a common use meaning of being full to the point of overflowing. Such a word is not useful within an RMA objective, especially when relating to ecosystems, as it does not describe a measurable or achievable end state.</p> <p>As Porirua City Council would need to give effect to the objective within its own RMA documents, primarily the district plan, we want to ensure that the language used is clear and precise. This means that redrafting of the objective is required.</p> <p>If such terms are retained in the wording of the objective, then these need to be defined and clearly articulated with thresholds so that we know, in a regulatory sense, when we have achieved the outcome sought.</p> <p>Timeframe for achieving the objective The National Policy Statement for Freshwater Management 2020 (NPS-FM) states at 3.3(2)(c) that longterm visions for freshwater must "identify a timeframe to achieve those goals that is both ambitious and reasonable (for example, 30 years after the commencement date)." We note that a 30-year timeframe would align with Porirua City Council's and GWRC's Long-term Plan timeframes.</p> <p>The draft objective sets a timeframe for achieving the goals of 2123, 100 years from now. It is not entirely clear why the objective is aimed at 2123, however, this may be due to the long-term aspirations expressed by Ngāti Toa Rangatira in their strategic documents. Porirua City Council recognises the critical importance of reflecting the aspirations of Ngāti Toa Rangatira within Objective TAP and has sought to engage with Ngāti Toa Rangatira on this matter, but at the time of preparing this feedback has not received any comments.</p> <p>While having a very long-term vision for Te Awarua-o-Porirua is generally supported, this will need to be coupled with highly aspirational goals to ensure progress is made in the short and medium terms. An additional objective with a sooner timeframe may be required to support the long-term 2123 objective in the medium term.</p>	<p>Officers have considered all of the issues raises by Porirua City Council and have made several amendments to incorporate the feedback provided. However, not all feedback has been incorporated. This response will address the 4 key points raised by Porirua City Council first and then address the specific wording changes suggested.</p> <p>Clarity of wording: Council officers agree with some of the changes suggested by Porirua City Council on this matter. Specific wording changes are discussed in more detail below.</p> <p>Timeframe for achieving the objective: Porirua City Council raises a good point here. Officers have selected a 100-year timeframe simply because it will take several decades to reverse the degraded state of the Porirua harbour, requiring significant changes environmental practice. Council is however amending the timeframe to 2100 to align with the upcoming regional plan change.</p> <p>More detailed outcomes as objectives will be included in the upcoming NRP change, which will very likely include short-term, medium-term, and long-term outcomes. Porirua City Council's district plan will need to be not inconsistent with these outcomes.</p> <p>Physical state and function of Te Awarua-o-Porirua: On reflection, officers largely agree with Porirua City Council on this point. Clause 2 has been reworded to incorporate kei te ora te mauri as the ultimate objective for this clause.</p> <p>Relationship with other objectives and policies: The long-term freshwater visions serve primarily to direct changes to the NRP, especially the insertion of outcomes as objectives into the NRP.</p> <p>In a hierarchy, the visions sit underneath Objective 12. Objective is the highest level objective for fresh water management, and reflects the concept of Te Mana o</p>	<p>By the year 2123³⁰ a state of wai ora is achieved for Te Whanganui-a-Tara in which the harbour, rivers, lakes, wetlands, groundwater, estuaries and coast are healthy, accessible, thriving, and sustainable for future generations, and provide for:</p> <ol style="list-style-type: none"> The practices and tikanga associated with Te Whanganui-a-Tara are revitalized and protected; and Mahinga kai are abundant, healthy, diverse and can be safely gathered by Taranaki Whānui and Ngāti Toa Rangatira and served to Taranaki Whānui and Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and Healthy and plentiful kaimoana and mahinga kai that can be served to manuhiri/guests by Taranaki Whānui, Ngāti

Party	Provision	Summary of Feedback Received	Response	New draft provisions
		<p>If the timeframe for Objective TAP is reduced or additional objectives introduced with an interim timeframe, careful consideration will be needed in relation to the achievability of the objective and the appropriateness of any supporting policies that state how the objective is to be achieved.</p> <p>Physical state and function of Te Awarua-o-Porirua While clause two of the draft objective addresses the "natural flow and energy within the harbour, streams, wetlands, estuaries and coast", the objective does not clearly state the outcome sought for the state and function of Te Awarua-o-Porirua in relation to coastal processes and geomorphology of the natural environmental features of Te Awarua-o-Porirua.</p> <p>As such, Porirua City Council considers that there needs to be a more clearly stated outcome around the physical state and function of the water bodies in relation to water flow, sedimentation and other coastal processes. This requires a separate clause within the objective.</p> <p>A new clause has been included in the redrafted objective in Appendix A. This includes reference to the physical state of the environment demonstrating kei te ora te mauri (the mauri of the place is intact). The wording of this clause was shared with Ngāti Toa Rangatira. Unfortunately, as noted above, no comments have been received at the time of preparing this feedback. GWRC may wish to discuss this or similar wording further with Ngāti Toa Rangatira.</p> <p>Porirua City Council also considers that a better-defined word to replace 'thriving' is needed in the first part of the objective to support the state and function clause and other outcomes stated in the clauses. 'Healthy' would be consistent with the draft objective for Te Whanganui-a-Tara.</p> <p>Relationship with other objectives and policies The relationship of Objective TAP to other objectives in the RPS is not entirely clear. If there a hierarchy intended, with this Objective TAP sitting above other objectives, this needs to be clarified through the variation.</p> <p>Further changes to the RPS may need to be included through the variation to show how the objective is integrated with other objectives and how it is to be implemented through policies. As a geographically based (as opposed to region-wide) objective it is important to understand how it integrates with other objectives. For example, as Objective TAP is more specific than Objective 12, it could be interpreted that it is to be applied instead that objective. This, however, is not made clear.</p> <p>Additionally, the RPS includes a table that shows the linkages between objectives, policies and methods. The draft variation does not include any amendments to that table. As such, it is not clear what policies and methods would link to the objective. While existing policies in the RPS may be relevant, and amendments to the proposed Natural Resources Plan are planned to give effect to the NPS-FM which will include provisions specific to Te Awarua-o-Porirua, it would be useful to have some explanation of how the objective is intended to be achieved through regulatory and non-regulatory mechanisms.</p> <p>Redrafted objective Porirua City Council officers have redrafted the objective to provide greater clarity. The redrafted objective is set out in Appendix A. The redrafted objective retains the intent of the objective, while making the wording clearer and more precise.</p>	<p>te Wai. The visions then aim to articulate what Te Mana o te Wai means for each whaitua/FMU.</p> <p>Redrafted objective: Chapeau: Council agrees that replacing "thriving" with "healthy" provides a more precise outcome. Council officers do not see the need to add "streams", as the RMA definition of rivers also includes streams. Council does not agree with adding the phrase "hydrologically connected" to the chapeau, as this would limit the vision to freshwater bodies that drain into the harbour, and there are a small number of freshwater bodies that do not drain into the harbour. Council has decided against inserting the phrase "landward extent of the coastal environment", as this would result in excluding the open coastal waters as a receiving environment. Council does agree to removing "provide for" from the end of the chapeau, as this creates more elegant drafting.</p> <p>Clause 1: Council agrees moving the wording around cultural practices and traditions to the start of the clause. Council will retain the reference to reviving cultural traditions, as this has been a key issue raised by Ngāti Toa. Council agrees with the insertion of wording around kaimoana/mahinga kai being safe to eat but intends to retain the wording around this being served to guests. Again, this was a key issue raised by Ngāti Toa.</p> <p>Clause 2: Council agrees with the removal of the word "rich". Council also agrees with the insertion of references a diversity of indigenous species. Council agrees with the insertion of the concept of "kei te ora te mauri", but considers that this is better as a unifying theme across the biotic and abiotic aspects and so will not split the ecological and natural processes aspects into separate clauses. Council will not add reference to "coastal energy regimes", as the relevance of coastal water is only as a receiving environment for freshwater.</p> <p>Clause 3: Council agrees with the addition of reference to communities. However, Council does not agree that reference to fostering a strong connection to waterbodies should be removed, as the ultimate objective from providing for access and recreational opportunities is to foster this strong connection between people/communities and waterbodies.</p> <p>Clause 4. Council does not agree with the removal of "mana" from this clause, as respecting the mana of the harbour has been a key issue raised by Ngāti Toa.</p>	<p>Tea Rangatira and the local community, reviving cultural practices and traditions.</p> <ol style="list-style-type: none"> 3. Have Restored <u>mauri/mouri that is nurtured, strengthened, and able to flourish and restored natural character, have a natural flow and ecosystems that support an abundance and diversity of indigenous species; and diverse and abundant life within the harbour, streams, wetlands, estuaries and coast.</u> 4. Provide for the safe access and use of all rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of recreational activities including fishing and customary uses, fostering an appreciation of and connection to these waterbodies; and. 5. Are managed taken care of in a waypartnership with Taranaki Whānui and Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa and Taranaki Whānui that recognizes and respects the mana of Te Whanganui-a-Tara and the whakapapa connection with Taranaki Whānui and Ngāti Toa Rangatira; and. 6. <u>Are resilient to the impacts of climate change; and</u> 7. <u>The use of water and waterways provide for social and economic use benefits, provided that such use does not compromise the health and well-being of waterbodies and freshwater ecosystems or the take and use of water for human health needs.</u>

Party	Provision	Summary of Feedback Received	Response	New draft provisions
		<p>By the year 2123 Te Awarua-o-Porirua harbour, <u>its hydrologically connected rivers, streams, estuaries and wetlands, estuaries and the landward extent of the coastal environment</u> are <u>thriving, healthy and accessible,</u> and <u>provide for:</u></p> <ol style="list-style-type: none"> 1. <u>The gathering and harvesting of nourishing kaimoana and mahinga kai that can be served to manuhiri/guests by Ngāti Toa Rangatira and the local community, reviving cultural practices and traditions. Provide for cultural practices and traditions of Ngāti Toa Rangatira including mahinga kai and the gathering of kaimoana that is safe for human consumption;</u> 2. <u>Have Rrestored and rich ecosystems that support a diversity of indigenous species; are brimming with life and have a natural flow and energy within the harbour, streams, wetlands, estuaries and coast.</u> 3. <u>Have naturalised water flow, sediment transportation and coastal energy regimes that demonstrate kei te ora te mauri (the mauri of the place is intact);</u> 4. <u>Provide for Safe access for people and communities to enjoy a range of recreational opportunities; activities, fostering a strong connection to these waterbodies;</u> 45. <u>Recognition of and respect for the mana of Te Awarua-o-Porirua Are recognized as a taonga of Ngāti Toa Rangatira; and</u> 6. <u>and the integration of its significance into-The interconnected nature of the region's freshwater and its management framework, and the significance of Te Awarua-o-Porirua within that framework, are recognized.</u> 		
Wellington Water Limited	Whole variation	<p>We would like to be consulted in the development of lower-level provisions and policies feeding from the long-term vision. This will help us understand Wellington Water's required level of service to deliver the long-term vision, and associated costs.</p> <p>We intend to support this version of the Regional Policy Statement Variation</p> <p><i>The draft long-term vision fits within central government's requirement to manage freshwater in a way that gives effect to Te Mana o te Wai</i></p> <ul style="list-style-type: none"> • The draft long-term freshwater vision is a high-level vision for Te Awarua-o-Porirua Whaitua and Whaitua Te Whanganui-a-Tara. • The vision fits within the context of the National Policy Statement for Freshwater Management, which requires freshwater to managed in a way that gives effect to Te Mana o te Wai. The Policy Statement provides that local authorities work with tangata whenua and communities to set out long-term visions in the regional policy statement. This draft long-term freshwater vision sets out what Te Mana o te Wai would look like for Te Awarua-o-Porirua Whaitua and Whaitua Te Whanganui-a-Tara. <p><i>Wellington water's 30 year strategy also looks towards Te Mana o te Wai</i></p> <ul style="list-style-type: none"> • Wellington Water's 30 year pathway for three waters investment recognises Te Mana o te Wai as a key guiding principle when making investment decisions. We acknowledge that restoring the quality of the water to levels mana whenua aspire to will likely be a decades long journey. However, the long-lived nature of infrastructure assets means that the decisions and investments we make over the coming 30 years will be pivotal to whether and when we get there. • We recognise that mana whenua's aspirations are our community's aspirations. Wellington Water's long term investment strategy aims to achieve te mana o te wai in 50-100 years, but success depends on transformational changes to the way our services are delivered. To move closer, we will need to: 	Support noted.	

Party	Provision	Summary of Feedback Received	Response	New draft provisions
		<ul style="list-style-type: none"> • Increase the rate of renewals by two or three factors, and then sustain at a rate consistent with condition based requirements • Expand the extent of asset condition assessment to encompass all asset classes and criticality • Increase planned maintenance activities to the optimal level (relative to costs for loss of service) • Continue and complete development of asset management system, including data and analytics • Expand monitoring, sensing and controls to enable optimised operations and maintenance (i.e. “smart water networks”) • Incorporate growth and resilience requirements into renewal investments. <p>We have some minor points to consider for the draft long-term vision</p> <ul style="list-style-type: none"> • We acknowledge the long-term freshwater vision is intended to be aspirational, however some of the language, e.g. “brimming with life” would be difficult to measure if not clarified in further provisions. We would like to be consulted in the development of further provisions. • Greater Wellington could consider how to describe the environment in a way that will help achieve the intent of the statement. We consider that the terms “rich” and “natural” could be clarify that ecosystems are restored, rather than replaced with invasive species, algae or weeds. 		
Ministry of Primary Industries (Fisheries New Zealand)	Whole variation	<p>We have reviewed the RPS variation and have no specific feedback on the proposal. Fisheries New Zealand’s interest is in freshwater management generally because of land based impacts on the coastal area, such as</p> <ul style="list-style-type: none"> • Sedimentation, • Freshwater diversion, • Microbial contamination, • Increased nutrient load, and • Pollution <p>Which can affect fishery species, habitats, and nursery areas that are found in areas such as estuaries, sheltered coastal embayments, and where large rivers empty directly onto the coast.</p> <p>Fisheries New Zealand are happy to discuss fisheries impacts from land-based inputs and how we can work together to try to address them through the new Council freshwater planning requirements. We are supportive of cross-agency collaborations between Councils, territorial authorities, the Department of Conservation and others on an integrated approach to the management of marine biodiversity.</p>	Feedback noted.	
Te Runanga o Toa Rangatira Inc	Whole variation	<p><u>By the year 2123 Te Awarua-o-Porirua harbour, awa, wetlands, groundwater, estuaries and coast are healthy, wai ora, accessible, sustainable for future generations and:</u></p> <p><u>The practices and tikanga associated with Te Awarua o Porirua are revitalized and protected. Mahinga kai are abundant, healthy, diverse and can be safely gathered by Ngāti Toa Rangatira and served to Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga. Have restored and healthy ecosystems that support an abundance and diversity of indigenous species, and have a natural water flow and energy that demonstrate kei te ora te mauri (the mauri of the place is intact).</u></p> <p><u>Provide for safe access for people and communities to enjoy a range of recreational activities, fostering a strong connection to these waterbodies.</u></p> <p><u>Are taken care of in partnership with Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa as kaitiaki of Te Awarua-o-Porirua as a taonga.</u></p> <p><u>Are resilient to the impacts of climate change.</u></p>	<p>Council agrees with the suggested insertion of “wai ora”, as this was a key concept in the Te Whanganui a Tara whitua process.</p> <p>Council agrees with the insertion of reference to “sustainable for future generations”, as this provides an overarching concept for the gathering of mahinga kai.</p> <p>Council agrees with the rewording to emphasise partnership, as this is a key aspect of honouring the principles of Te Tiriti.</p> <p>Council agrees with reframing “managing” as “taking care of”, as this better emphasizes the personal and spiritual connection to water that is sought by the visions.</p>	

Party	Provision	Summary of Feedback Received	Response	New draft provisions
		<p><u>By the year 2123 a state of wai ora is achieved for Te Whanganui-a-Tara in which the harbour, rivers, lakes, wetlands, groundwater, estuaries and coast are healthy, accessible, sustainable for future generations, and:</u></p> <p><u>The practices and tikanga associated with Te Whanganui-a-Tara are revitalized and protected. Mahinga kai are abundant, healthy, diverse and can be safely gathered by Taranaki Whānui and Ngāti Toa Rangatira and served to Taranaki Whānui and Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga. Have restored mauri/mouri and natural character, and ecosystems that support an abundance and diversity of indigenous species.</u></p> <p><u>Provide for the safe access and use of all rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of recreational activities, fostering an appreciation of and connection to these waterbodies.</u></p> <p><u>Are taken care of in partnership with Taranaki Whānui and Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa and Taranaki Whānui that respects the mana of Te Whanganui-a-Tara and the whakapapa connection with Taranaki Whānui and Ngāti Toa Rangatira</u></p> <p><u>Are resilient to the impacts of climate change.</u></p>	<p>Council agrees with adding a new clause referring to resilience to the impacts of climate change, given climate change will pose a particular threat to ecosystems and mahinga kai.</p>	
<p>Greater Wellington Regional Councillors</p>	<p>Whole variation</p>	<p>Summarised below:</p> <ul style="list-style-type: none"> - More explicitly include the long term vision Te Pūtake contained in the Whaitua Te Whanganui a Tara WIP? - Can the vision wording be presented in both languages in the RPS? - Social and economic uses of water need to be recognised. - Ensure that the language of “harbour, rivers, lakes, wetlands, groundwater, estuaries and coast” includes streams and the seeps and springs that sometimes begin them - Reflection of the criticality of the Te Awa Kairangi sub-catchment as a provider of drinking water for the whole of the Wellington Region. - Mention specific issues experienced by the Hutt - water abstraction for potable water supply, flow rate and flooding mitigation. - Broaden part about mahinga kai to include recreational fishers. 	<p>Officers do not consider that it would be beneficial to add a te reo Māori translation of the provisions, as this creates a risk of having parallel objectives that are subtly different, which could create confusion and implementation difficulties.</p> <p>Officers agree that more explicitly using the language of Te Pūtake would be beneficial as it would link the wording of the objectives more closely to that of the WIP.</p> <p>Officers agree that reference to economic benefits would be beneficial and have drafted a new clause 7 to reflect this while aligning with the hierarchy of obligations in the NPS-FM 2020. This clause includes mention of broader social benefits, implicitly covering drinking water.</p> <p>Officers have added new wording to explicitly refer to recreational fishing.</p>	

