

Wellington NRP PC1 - Hearing Stream 2

Speaking Notes: Joe Jeffries, Wellington City Council. 15 April 2025

1. My name is Joe Jeffries. I am a Principal Planner at Wellington City Council. I have provided planning evidence on behalf of Wellington City.
2. The key matter addressed in my evidence is the timeframes for achieving Target Attribute States and coastal water objectives.
3. While the Wellington City submission sought changes to the timeframes for a number of provisions in PC1, some of these are of limited relevance to Wellington City. I will therefore focus on:
 - a) The TAS for rivers set out in tables 8.4 and 9.2. (Issue 8 in the s42A report)
 - b) The coastal water objectives in tables 8.1 and 9.1 (Issue 13).

Key points in my statement of evidence on timeframes

4. My statement of evidence recommends adopting a 2060 timeframe for achieving the targets recommended in the s42A report on the basis that a 2040 timeframe:
 - a) is practically unachievable and unaffordable to rate payers. and
 - b) has not been demonstrated as the most appropriate means of achieving the purpose of the plan change in terms of section 32.
5. In my view, a 2060 timeframe is more appropriate than 2040 as it:
 - a) it is more practically achievable,
 - b) it meets the requirements of the NPS-FM,
 - c) it is more affordable,
 - d) and it more appropriately balances economic costs with environmental benefits.
6. The tables provided at paragraph 43 and 45 of my evidence set out the step change in rates and workforce required to achieve the notified and s42A targets for a 2040 and 2060 timeframe based on Mr walker's evidence.
7. Achieving the less stringent targets recommended in the s42A report by 2040 reduces costs in comparison to the notified target. However, a longer timeframe for achieving the targets to 2060 has a much greater impact on affordability and achievability.

GWRC rebuttal response

8. In his rebuttal statement, David Walker concurs with my statement and recommends the relaxation of timeframes for some part FMUs to 2060. Ms O'Callahan adopts these recommendations in her rebuttal.
9. With these changes the three urban catchments relevant to Wellington City now have timeframes for achieving E.coli targets of 2040, 2050 and 2060. This significantly improves affordability and achievability compared to a 2040 timeframe. I partially support these changes on that basis.
10. However, it is unclear to me why a revised 2060 or 2050 timeframe is recommended for some FMUs but not others.

GWRC legal rebuttal

11. The legal rebuttal and rebuttal of Ms O'Callahan state that criticisms of the section 32 assessment are not helpful for the panel's decision making.
12. The legal rebuttal also states that "criticism that the Council should have assessed alternative options for the TAS is therefore unfounded".
13. I disagree. Assessing costs, benefits and alternative options is fundamental to good policy making. It is not just a box ticking exercise or strictly a matter of law.
14. 2040, 2060, and mixed timeframes have all been considered by the regional council in some form but the reasoning process behind this exercise has not been made obvious. There has not been a clear justification provided for the recommended timeframe. In my view clearly setting out the reasoning for adopting one option over another in a section 32 evaluation is helpful to the panel's decision making.
15. The legal rebuttal also counters criticism of the section 32 evaluation by pointing out that the territorial authorities "consider they have enough information to put forward what they seek".
16. While my recommended changes were based on the information available, they were limited by gaps in the evidence base. I had to make assumptions in the absence of clear information and reasoning from GWRC.
17. I pointed these gaps out in my evidence at paragraph 60. While some of these matters have been addressed through rebuttal, gaps in the evidence remain. In particular:
 - a) The economic evidence assesses costs to meet the E.coli and metals targets but not the other attributes. I understand that E.coli and metals are the key attributes relevant to wastewater and stormwater infrastructure respectively, and that improvements to these will generally lead to improvements to other attributes. However, it remains unclear

whether achieving the other TAS will have additional cost implications on the infrastructure upgrades required.

- b) The economic evidence does not assess the costs of achieving the coastal water objectives. While it is reasonable to assume that improvements to freshwater will lead to improvements to coastal water, it remains unclear whether achieving the coastal water objectives will have additional costs not already accounted for. This is of particular concern now that there are different timeframes recommended for freshwater and coastal objectives, meaning that freshwater targets cannot be relied on as a proxy for achieving coastal objectives.

Interim target

- 18. In my evidence I recommended that more work is undertaken to establish interim targets so that the plan is consistent with the NPS-FM.
- 19. Ms O'Callahan has now recommended the introduction of two new objectives on achieving interim targets.
- 20. I support the inclusion of the recommended interim targets in principle.

Conclusion

- 21. While I partially support the mixed timeframe recommended through rebuttal, I continue to recommend a 2060 timeframe for all catchments and targets relevant to wellington city, as on current information this option provides greater certainty around achievability and affordability, and ensures consistency between the freshwater and coastal targets.