

**Before the Hearings Panels
At Greater Wellington Regional Council**

Under Schedule 1 of the Resource Management Act 1991

In the matter of Natural Resources Plan - Plan Change 1

Hearing Topic Hearing Stream 2

**Statement of evidence of Torrey James McDonnell on behalf of Hutt City
Council (Planning)**

Date: 14 March 2025

INTRODUCTION:

- 1 My full name is Torrey James McDonnell. I am employed as a Principal Planner by Incite Wellington.
- 2 I have prepared this statement of evidence on behalf of Hutt City Council (“HCC”) to provide planning evidence in relation to its submission to Greater Wellington Regional Council’s (“the Council”) Plan Change 1 (“PC1”) to the Natural Resources for the Wellington Region (“RPS”).
- 3 Specifically, this statement of evidence relates to the matters in Hearing Stream 2.
- 4 I am authorised to provide this evidence on behalf of HCC. While I am contracted by HCC, I am giving this evidence as a planning expert, and the views I express in this evidence are my own.

QUALIFICATIONS AND EXPERIENCE

- 5 I hold the qualifications of Bachelor of Science (Majoring in Geography) and a Master of Planning both from Otago University.
- 6 I currently work for Incite Resource and Environmental Consultants, based in the Wellington office. I provide expert advice on a variety of resource management matters, including national policy development, growth/spatial planning, district and regional plan policy development, and district and regional consenting. This includes providing policy advice to HCC to inform their current District Plan Review programme.
- 7 I am familiar with PC1 having drafted both HCC and Porirua City Council’s (“PCC”) submissions.
- 8 I am also familiar with Change 1 to the Regional Policy Statement (“RPS Change 1”) including giving evidence on behalf of PCC in Hearing Stream

3 (natural hazards) and 5 (freshwater). I also gave evidence on behalf of HCC on Hearing Stream 4 (urban development).

9 I worked for PCC as a Principal Policy Planner from 2017 to 2023. I was involved in the preparation of the 2020 Porirua Proposed District Plan (“PDP”).

10 Prior to PCC, my work experience included working as a Senior Analyst for the Ministry for the Environment developing national direction under the RMA (including the development and implementation of the 2011 National Policy Statement for Freshwater Management); and working as a planner for the Transit New Zealand Otago/Southland regional office where my main duties included both consenting and policy input.

11 I am a full member of the Te Kōkiringa Taumata/New Zealand Planning Institute, and a member of its Wellington Branch Committee.

Code of conduct

12 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I have complied with that Code when preparing my written statement of evidence and I agree to comply with it when I give any oral evidence.

13 My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

SCOPE OF EVIDENCE

- My statement of evidence addresses the following matters arising from HCC’s submission on PC1 which relate to objectives and ecosystem health and water quality policies in Chapter 8 - Whaitua Te Whanganui-a-Tara.

- 14 In preparing my evidence, I have reviewed the following documents:
- 14.1 The Section 32 Evaluation of provisions for PC1 (Section 32 Evaluation Report);
 - 14.2 Section 42A Hearing Report: Objectives, prepared by Mary O’Callahan;
 - 14.3 Section 42A Hearing Report: Ecosystem Health and Water Quality policies, prepared by Mary O’Callahan;
 - 14.4 GWRC evidence uploaded to the hearings website alongside the Section 42A reports including:
 - 14.4.1 HS2 GWRC Technical Evidence of Dr Michael Greer 280225 (Freshwater);
 - 14.4.2 HS2 GWRC Technical Evidence of Mr David Walker 280225 (Economics); and
 - 14.5 The National Policy Statement for Freshwater Management 2020 (“NPS-FM”) as amended in October 2024.

Response to Section 42A Report

Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100 - Hutt City Council [S211,006]

- 15 HCC seeks relatively minor changes to this objective to:
- 15.1 Remove the word “Note” from the objective, for the reason that it was not clear whether the text below was an advisory note or part of the objective; and

- 15.2 Add a qualifier that “All freshwater bodies have planted margins where possible”, for the reason that Te Whaitua te Whanganui-a-tara has been heavily modified, and it is not physically possible for all waterbodies to have planted margins (groundwater or streams within culverts for example).
- 16 The reporting officer recommends partial acceptance of this submission point in that they recommend the removal of the word “note”¹, and the addition of a qualifier “where practicable”². I support this recommendation as “practicable” can be tested with an assessment of practicality.
- 17 The Reporting Officer has recommended the replacement of the term “freshwater bodies” with “rivers and streams”. I consider that wetlands should also be included as these habitats would also benefit from improved riparian habitat.
- 18 The Reporting Officer has also recommended the addition of an advice note to this objective as follows³:
- Note: Objectives WH.O2 to WH.O9 set out what is needed to achieve progressive implementation of this long-term objective up to 2040. Therefore, resource consent applicants do not need to demonstrate their proposed activities align with this objective.*
- 19 This recommended addition is not addressed in Section 3.6 of the Section 42A Hearing Report: Objectives. It is therefore unclear what the reasoning is for the recommended change. Regardless, I do not see how the RMA requirements relating to considering plan objectives in

¹ Paragraph 151 Section 42A Hearing Report: Objectives.

² Paragraph 154 Section 42A Hearing Report: Objectives.

³ Appendix 4: Recommended Amendments to Provisions and Section 32AA Evaluation

decision-making on consents under Section 104 can be overridden by an advice note. As such, it is ultra vires and I recommend that it be deleted.

- 20 My recommended amendments to WH.O1 are set out in **Appendix A** of this Statement. I have also recommended the addition of semi-colons to this list as a minor grammatical improvement that could be made under Clause 16.

Objective WH.O3: Table 8.1 Coastal water objectives; and Objective WH.O8: Table 8.4 Target attribute states for rivers - Hutt City Council [S211.002, S211.003, S211.007, S211.009]

- 21 HCC's submission seeks that the timeframe for target attribute states for E. coli and enterococci coastal water objectives be amended from 2040 to 2060.

- 22 The submission states that there are significant challenges in terms of the costs to upgrade the wastewater network to achieve this objective. The Section 32 Evaluation states that the E. coli target has been calculated to be between \$2.5-3.1 billion for Te Whaitua te Whanganui-a-Tara, and the increased cost to ratepayers to meet the 2040 E.coli limit would be a rates increase of 25-31%, and 12-15% for an alternative 2060 timeframe. Council notes in its submission that this would be on top of Business-as-usual rates increases, and that it is highly unlikely that it's ratepayers will be able to afford 25-31% increases on top of this.

- 23 The submission goes on to state that:

While the 2060 target of 12-15% will still put a significant strain on households, it is much more achievable than the 2040 target provided other funding avenues are explored as outlined in the s32 including growth charging and debt funding. In addition to these other avenues, significant central government funding will be required.

Repairing the public network would only reduce a proportion of the contaminant load. There are known issues with private

laterals that make up half the network by length and a significant portion of untreated discharges to land and water. The costs that would fall on landowners to upgrade pipes within the private network are not figured into the s32 Evaluation, and these investments would be substantial to meet the 2040 target.

- 24 The submission concludes that the impact of the above funding requirements on housing and business development capacity is not sufficiently explored in the Section 32 Evaluation.
- 25 With regard to the target attribute state (TAS) for coastal water, the Section 42A Report: Objectives recommends retaining the 2040 timeframe, but requiring a less stringent target for some monitoring sites set out in a new Table 8.1A. For example, in Hutt City the target for enterococci in Table 8.1A is recommended to change from 200 to 500 cfu/100ml along Petone beaches, while the target of 200 is recommended to be retained for beaches along the beaches around Eastbourne. The Section 42A Report states that “both 200 and 500 cfu/100 mL are regarded as being suitable for swimming”. With regard to the timeframe, the Section 42A report states⁴:

I do not recommend including targets for 2060 now, as there is too much uncertainty to predict the level of further improvement from the adjusted 2040 targets to get to a fully safe level in the future. Both the extent of further investment still needed at that time, and the achievability in terms of funding, construction resources, etc cannot be understood for the period 2040-2060 at the current time.

⁴ Refer Paragraph 329.

26 The Section 42A Report is clear that the “recommendations are a values-based planning conclusion”⁵.

27 With regard to the target attribute state for E.coli in rivers, the Section 42A Report: Objectives recommends⁶:

I consider it preferable to relax the TAS rather than extend the timeframe as sought by these submitters. An amendment of this nature is within the scope of these ‘timeframe’ submissions, because the impact of my proposed change is similar by reducing the quantum of the improvement burden in the period to 2040, particularly for councils and WWL who assume responsibility for the improvements to community wastewater and stormwater networks. Economic evidence on the estimated costs to territorial authority stormwater and wastewater networks to meet their contribution to achieving the E.coli and metals TAS is provided in Mr Walker’s brief of evidence which has informed my opinion.

28 In his evidence, Mr Walker explores the costs associated with the 2040/2060 timeframe, as well as the costs associated with the target attribute state (TAS) set out in the notified PC1 and the minimum required improvement (MRI) set out in the NPS-FM. The conclusions from Mr Walker’s evidence are that⁷:

In my professional view, the costs to TAs of contributing to achieving the PC1 metals and E. coli TAS by 2040 is both unaffordable from a rates impact perspective and unachievable from a capacity perspective. Average rates could rise by up to 35% sustained for 16 years, while the

⁵ Refer Paragraph 216.

⁶ Refer Paragraph 329.

⁷ Refer Page 33-34.

workforce capacity would need to surge by up to 162% sustained over 16 years. Excluding any servicing and maintenance costs, achieving the TAS could cost up to \$5.37 billion.

If we relax the timeframe to achieve the PC1 metals and E. coli TAS to 2060, average rates could still rise by up to 15% sustained for 36 years, while the workforce capacity would need to surge by up to 17% sustained over 36 years.

The longer timeframe allows the costs of improvements to be spread over a longer time period, but does not negate any of the \$5.37 billion in spending, nor the maintenance and servicing costs associated with that spending.

Even achieving the less stringent E. coli MRI could require rates to rise by up to 22% sustained for 16 years, while the workforce capacity would need to surge by 20% to 69% sustained over 16 years. Achieving E. coli MRI would cost considerably less, at up to \$3.36 billion at the high end of estimates, excluding maintenance and servicing costs. This is \$2 billion less than the equivalent estimate for the cost of achieving the PC1 metals and E. coli TAS.

If we relax the timeframe to deliver the MRI to 2060, this could require rates to increase up to 10% sustained for 36 years without allowing for maintenance or servicing costs but would be able to be accommodated within current workforce capacity. However, it does introduce the risk of investment being delayed until much later and thus avoiding making genuine improvements in water quality.

29 Specifically for Hutt City, Mr Walker finds that: “The metals and E. coli TAS would require a step-change of up to 57% in rates, maintained for

16 years, or from 20% to achieve E. coli MRI”⁸ and that “affordability challenges are likely to emerge, even with Hutt City’s population profile”⁹.

30 Mr Walker sets out a number of caveats to these figures including:

- Costs occurring to ratepayers (such as remediating cross-connections) is specifically outside the scope of his assessment.
- Costs are capital costs only and exclude any ongoing maintenance costs, which have not been able to be meaningfully estimated and are highly dependent on the mix of solutions applied. As such, these costs are likely to be underestimates.

31 Mr Walker’s evidence does not appear to assess the changes to both fresh and coastal water target attribute states recommended by the reporting officer. There is also no evidence on the impact that the targets will have on housing and business capacity targets under the National Policy Statement for Urban Development 2020. I therefore consider that there is insufficient Section 32AA analysis in terms of economics costs for these recommendations.

32 Based on the evidence provided by GWRC, I consider that the recommended target attribute states are both unaffordable and unachievable for Hutt City ratepayers by 2040 as:

32.1 The 2040 E.coli limits alone would require at least 22% average rates rises across the region sustained for 16 years (based on at least a minimum improvement level as outlined by Mr Walker);

⁸ Refer Paragraph 38.

⁹ Refer Paragraph 50.

- 32.2 These rates rises would be higher for Hutt City (perhaps double when extrapolated from Mr Walker’s analysis of the 2040 notified target);
- 32.3 Rates rises would be on top of BAU rates rises for other Council functions which have been substantial in recent years, for example in the year 2024/25 rates increased by 16.9% in Hutt City¹⁰;
- 32.4 Mr Walker’s costings exclude costs required on private property which are a significant contributor to E.coli loads as outlined in HCC’s submission;
- 32.5 The region lacks sufficient civil construction capacity and capability to deliver improvements by 2040 as outlined by Mr Walker;
- 32.6 There is significant uncertainty for the sector and Wellington Water itself with regard to central Government reforms including the “Local Water Done Well” programme¹¹ and draft standards being consulted on by Taumata Arowai for stormwater and wastewater discharges¹²;
- 32.7 There is uncertainty with regard to what actions are even required in some cases to achieve water quality targets (refer paragraphs 182 to 185 of Dr Greer’s evidence with regard to uncertainty with regard to methods to achieve primary contact targets in Te Awa Kairangi).

¹⁰ <https://www.huttcity.govt.nz/people-and-communities/news/2024/green-light-for-a-10-year-plan-with-a-resilience-focus>

¹¹ <https://www.dia.govt.nz/Water-Services-Policy-and-Legislation>

¹² <https://www.taumataarowai.govt.nz/for-stormwater-and-wastewater-operators/>

33 For these reasons I consider that a 2060 timeframe to achieve the notified target attribute states is preferable to the reporting officer's recommended lower 2040 targets. I agree with HCC's submission which supports the notified target attribute states themselves, as these are ambitious and align with Mana Whenua and community aspirations.

34 I consider that a longer timeframe would provide time to scope specific actions required to reduce sources of contaminants, engage with iwi/community on options, secure funding, obtain necessary consents, undertake detailed design, increase workforce capacity, and undertake the improvements required to the wastewater and stormwater networks.

Objective WH.08: Primary contact sites within Te Awa Kairangi/Hutt River, Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact - Hutt City Council [S211.002, S211.003, S211.008]

35 HCC's submission seeks the amendment of the timeframe in WH.08 to achieve E.coli concentrations that are suitable for primary contact from 2040 to 2060.

36 HCC's submission outlines that there are significant challenges in terms of the costs to upgrade the wastewater network to achieve the reduction in E. coli by 2040, and supports the inclusion of 2060 in Objective WH.08 on the basis that it does not impose the same significant challenges and costs on Council.

37 The Section 42A Report: Objectives recommends rejection of this relief sought as¹³:

I have sought advice from Dr Greer as to the extent of change needed to meet the three targets that require improvements, i.e. Te Awa Kairangi at Melling Bridge, Pākuratahi River at

¹³ Refer Paragraph 273.

Kaitoke Campground and Wainuiomata River at Richard Prouse Park. He provides some context for these locations and indicates only the Te Awa Kairangi/Hutt River @ Melling Bridge appears to be impacted by the wastewater or stormwater network, so is the only primary contact site that needs to be prioritised. He indicates the cause of the high current state readings documented in my updates to Table 8.3 in Appendix 4 are unlikely to be significantly influenced by WWL managed network discharges.

38 It is unclear why HCC's relief sought is recommended to be rejected based on advice from Dr Greer. The Section 42A: Objectives report fails to address the concerns raised by HCC relating to the costs to upgrade the wastewater network to achieve the reduction in E. coli by 2040.

39 Further, Dr Greer's evidence is that¹⁴:

Nevertheless, it is not currently possible to quantify the E. coli load reductions or specific actions required to achieve the TAS for the Te Awa Kairangi/Hutt River @ Melling Bridge site. All that is known from the current data is that 95th percentile concentrations must reduce by ~ 23% to achieve that TAS. Thus, I cannot comment on the validity of WWL's assertion that that the TAS cannot be achieved by 2040.

40 If it is not possible to quantify the E. coli load reductions, or the specific actions required to achieve these, the objective does not have sufficient justification under Section 32 with regard to whether it is the most appropriate way to achieve the purpose of the Act.

41 I consider that the Panel should accept the relief sought by HCC and amend the timeframe to 2060 as requested. While the ability of HCC to

¹⁴ Refer Paragraphs 182 to 185.

achieve this 2060 outcome is uncertain, it at least provides more time for Council to work with GWRC to determine what specific actions could be required to achieve it, and the costs could be spread out over a longer period of time.

Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives - Hutt City Council [S211.010]

42 HCC seeks amendments to Policy WH.P2 as follows:

Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives

Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:

*(a) ~~prohibiting-avoiding~~ **unplanned greenfield development** and ~~for managing~~ other greenfield developments **minimising** the contaminants and requiring financial contributions as to offset adverse effects from residual **stormwater** contaminants, and*

~~(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load,~~
and

(...)

43 The reasons for the changes sought to (a) in HCC's submission include:

- The prohibition of unplanned greenfield development may result in unintended consequences with no consenting pathway to consider a proposal located in these areas that may have positive outcomes, including positive outcomes for freshwater.
- The application of a prohibited activity status requires a high level of evaluation to justify its use. Council does not consider that the Section 32 Evaluation provides a sufficient level of justification.
- The prohibition on greenfield development is also inconsistent with the NPS-UD. Unplanned greenfield development is defined as areas identified in maps 86,87, 88 and 89. For Hutt City, Map

89 reflects the Operative District Plan. Council is currently undertaking a full District Plan Review. Unlike other territorial authorities in the region, Council is yet to notify a district plan that is fully implements the NPS-UD, including the identified demand for housing and business land, therefore the avoid/prohibited approach may therefore directly conflict with Council's ability to give effect to the NPS-UD.

- 44 The Section 42A Report: Ecosystem Health and Water Quality policies addresses submissions on this policy in Section 3.4 in a general sense. The Reporting Officer considers that the policy is unnecessary and should be deleted on the basis that it duplicates other policies or rules and schedules in PC1 or the NRP.
- 45 The Reporting Officer considers that WH.P1(a) duplicates WH.P16. I agree. This aligns with HCC's relief sought in relation to deleting WH.P16. If the Panel agrees with the recommendation to delete WH.P2 and retain WH.P16, I consider that the relief sought in relation to WH.P2(a) should apply with regard to removal of the prohibition of unplanned greenfield development for the reasons given by HCC above.
- 46 I agree with the deletion of WH.P1(b) as the "encouraging" policy direction is inconsistent with other policies and rules which seek to impose regulations on the redevelopment of existing urban areas.

Date: 14/03/2024

W. Donnell

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Appendix A: Recommended amendments

| Submission Point Ref. | Provision | Relief Sought by HCC (green text where relevant) | Section 42A report Recommendation | | Recommended Amendments to Section 42A Version (blue text) |
|-----------------------|---|---|-----------------------------------|---|---|
| | | | Response | Recommended Changes (red text) | |
| S211.002 | General comments - target attribute states | Not stated (Considers that setting an <i>E. coli</i> target timeframe of 2060 will be less costly to HCC ratepayers than the proposed 2040 timeframe.) | Accept in part | N/A | N/A |
| S211.003 | General comments - target attribute states | Amend the proposed 2040 <i>E. coli</i> target timeframe to 2060. | Accept in part | N/A | N/A |
| S211.006 | Objective WH.01: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100. | <p>Amend objective as follows:</p> <p>Objective WH.01 The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.</p> <p><u>Note</u> In the wai ora state:</p> <ul style="list-style-type: none"> • Āhua (natural character) is restored and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character • All freshwater bodies have planted margins <u>where possible</u>: <p>All freshwater bodies and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species</p> <ul style="list-style-type: none"> • Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga • Mana whenua are able to undertake customary practices at a range of places throughout the catchment. | Accept | <p>Objective WH.01</p> <p>The health of all freshwater bodies rivers and lakes and their margins, natural wetlands, groundwater and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.</p> <p><u>Note</u> In the wai ora state:</p> <ul style="list-style-type: none"> • Āhua (natural character) is restored where deteriorated and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character • All freshwater bodies rivers and lakes have planted margins, where practicable • All freshwater bodies rivers and lakes and their margins, natural wetlands, groundwater and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species • Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga • Mana whenua are able to undertake customary practices at a range of places throughout the catchment. • Water is able to be used for social and economic use benefits, provided that the health and well-being of waterbodies, freshwater ecosystems and coastal waters is not compromised. <p><u>Note: Objectives WH.02 to WH.09 set out what is needed to achieve progressive implementation of this long-term objective up to 2040. Therefore, resource consent applicants do not need to demonstrate their proposed activities align with this objective.</u></p> | <p>Objective WH.01</p> <p>The health of all freshwater bodies rivers and lakes and their margins, natural wetlands, groundwater and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.</p> <p><u>Note</u> In the wai ora state:</p> <ul style="list-style-type: none"> • Āhua (natural character) is restored where deteriorated and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character; • All freshwater bodies wetlands, rivers and lakes have planted margins, where practicable; • All freshwater bodies rivers and lakes and their margins, natural wetlands, groundwater and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species; • Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga; • Mana whenua are able to undertake customary practices at a range of places throughout the catchment; and • Water is able to be used for social and economic use benefits, provided that the health and well-being of waterbodies, freshwater ecosystems and coastal waters is not compromised. <p><u>Note: Objectives WH.02 to WH.09 set out what is needed to achieve progressive implementation of this long-term objective up to 2040. Therefore, resource consent applicants do not need to demonstrate their proposed activities align with this objective.</u></p> |
| S211.007 | Objective WH.03: Table 8.1 Coastal water objectives. | Amend the timeframe for target states for <i>E. coli</i> and enterococci coastal water objectives to 2060. | Accept in part | [Recommends retaining 2020 in Table 8.1] | [I recommend amending the target date to 2060 in Table 8.1] |
| S211.008 | Objective WH.08: Primary contact sites within Te Awa Kairangi/Hutt River, Pākūratahi River, Akatarawa River and | Amend Objective WH.08 as follows: Primary contact sites within Te Awa Kairangi/Hutt River, Pākūratahi River, Akatarawa River and Wainuiomata River are suitable for | Reject | Objective WH.08 Primary contact sites within Te Awa Kairangi/Hutt River, Pākūratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact by ensuring that by 2040: | Objective WH.08 Primary contact sites within Te Awa Kairangi/Hutt River, Pākūratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact by ensuring that by 2040 2060 : |

| Submission Point Ref. | Provision | Relief Sought by HCC (green text where relevant) | Section 42A report Recommendation | | Recommended Amendments to Section 42A Version (blue text) |
|-----------------------|--|---|-----------------------------------|--|--|
| | | | Response | Recommended Changes (red text) | |
| | Wainuiomata River are suitable for primary contact. | primary contact by ensuring that by 2040 2060 : (a) <i>Escherichia coli</i> concentrations are at least maintained, or improved where the target attribute states in Table 8.3 are not met, and (b) there is low risk of health effects from exposure to benthic cyanobacteria. | | (a) <i>Escherichia coli</i> concentrations are at least maintained, or improved where the target attribute states in Table 8.3 are not met, and (b) there is low risk of health effects from exposure to benthic cyanobacteria. | (a) <i>Escherichia coli</i> concentrations are at least maintained, or improved where the target attribute states in Table 8.3 are not met, and (b) there is low risk of health effects from exposure to benthic cyanobacteria. |
| S211.009 | Table 8.4: Target attribute states for rivers. | Amend the timeframe for target states for <i>E. coli</i> and enterococci coastal water objectives to 2060. | Accept in part | [Recommends retaining 2020 in Table 8.4] | [I recommend amending the target date to 2060 in Table 8.4] |
| S211.010 | Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives. | Amend Policy WH.P2 as follows: Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) prohibiting avoiding unplanned greenfield development and for managing other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater. | Accept in part | Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk , and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater. | Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: (a) prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and (b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and (c) imposing hydrological controls on urban development and stormwater discharges to rivers (d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and (e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and (f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and (g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk , and (h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater. |