

Submitter ID:

File No:

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Greg. Boyle

ORGANISATION (* the organisation that this submission is made on behalf of)

Carterton District Council

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

P O Box 9
Carterton 5743

Attention: Greg. Boyle

PHONE

06 379 4030 Mobile 0274 446 827

FAX

06 379 4039

EMAIL

greg.boyle@cdc.govt.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

Carterton District Council (CDC) is a territorial authority that owns and operates infrastructure, including regionally significant infrastructure, that supports the community of Carterton. Its essential services include water supply, wastewater collection, treatment and disposal, stormwater collection, treatment and disposal, local roads and solid waste management. CDC is also responsible for a number of functions under the RMA and is a consent authority. The efficient, effective and sustainable delivery of many of CDC's responsibilities are impacted on by the PNRP. CDC made a submission on the Proposed Natural Resource Plan including submission points on provisions that are the subject of submissions by others. The Council has

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:

Date:

29 March 2016

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

Details of the submission you are commenting on Name of person/ group making original submission and postal address.	Original submission number The original submission number can be found on the submitter address list.	Position Whether you support or oppose the submission.	Part(s) of the submission you support or oppose Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions.	Reasons Why you support or oppose each submission point.	Relief sought The part or whole of each submission point you wish to be allowed or disallowed.	
<i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood	<i>e.g.</i> submitter S102	<i>e.g.</i> Oppose	<i>e.g.</i> Oppose all of submission point S102/41	<i>e.g.</i> The submission point does not recognise...	<i>e.g.</i> Disallow the parts of S102/41 relating to...	
Please see the attached table setting out the specific further submission points of Carterton District Council.						

GWRC PROPOSED NATURAL RESOURCES PLAN

FURTHER SUBMISSION POINTS OF CARTERTON DISTRICT COUNCIL ('CDC'):

SCHEDULES:

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Schedule A	Outstanding Water Bodies	Rangitane o Wairarapa Inc. S279/220	Include the following water bodies and their tributaries in Schedule A and Map 1: Turanganui, Tauanui, Ruakokoputuna, Ruamahanga, Taueru, Whangaehu, Waingawa, Waipoua, Waiohine, Kopuaranga, Hapua Korari, the Hidden Lakes plus all tributaries of the Ruamahanga River	Oppose in part: The submission does not clarify the basis for inclusion of all tributaries of the Ruamahanga in Schedule A. CDC opposes the default non-complying activity rule status created by the rule framework for activities within Scheduled sites and notes that the proposal would introduce another ground for triggering that status. Request: Establish the evidence-based rationale for inclusion of all tributaries of the Ruamahanga River in Schedule A or disallow the submission point.
Schedule A	Outstanding Water Bodies	Fish and Game S308/146	Include in Schedule A: Mangatarere River, Waiohine River and include provisions to protect high naturalness sites, natural character	Oppose in part: The submission does not clarify the basis for inclusion of all parts of the named rivers in Schedule A. CDC opposes the default non-complying activity rule status created by the rule framework for certain activities within Scheduled sites and notes that the proposal would introduce another ground for triggering that status. Request: Establish the evidence-based rationale for inclusion of all parts of the Mangatarere and Waiohine Rivers in Schedule A or disallow the submission point.
Schedule C	Mana Whenua Values	Dairy NZ and Fonterra S316/139	Amend Schedule C to qualify the significance of listed sites and highlight the type of activities that warrant restriction in a particular site.	Support: CDC shares the submitter's concern about the stringent consent status and protective policies that apply to scheduled sites where the significance of the sites is not clearly identified and where the scope of activities of concern is not identified. Requests: Allow the submission or such further or other relief as will achieve the same outcome.
Schedule C	Mana Whenua Values	Federated Farmers NZ S352/271	Amend Schedule C to specify whether the sites are held in public or private ownership,	Support: CDC shares the submitter's concern about the stringent consent status and protective policies that apply to scheduled sites where the significance of the sites is not

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
			specific threats and pressures on values and site-specific restrictions on activities.	clearly identified and where the scope of activities of concern is not identified. Requests: Allow the submission or such further or other relief as will achieve the same outcome.
Schedule C	Mana Whenua Values	Rangitane o Wairarapa Inc. S279/222	Requests add Ruamahanga River and all tributaries (includes Mangatarere Stream and Waiohine River) in Schedule C5 and include all Schedule B Nga Taonga Nui a Kiwa sites into Schedule C	Neither support nor opposition: Inclusion in Schedule C elevates consent status for some activities to non-complying activity. CDC opposes the default non-complying activity rule status created by the rule framework for activities within scheduled sites and notes that the proposal would introduce another ground for triggering that status. Request: Amend the default consent status for activities within the named scheduled sites as requested by CDC's original submission or such further or other relief as will achieve the same outcome.
Schedule F	Ecosystems and habitats with significant indigenous biodiversity values	Royal Forest and Bird Protection Society S353/178	Extend Schedules F4 and F5 (sites and habitats with significant indigenous biodiversity in the c.m.a.) to include sites within the coastal environment.	Neither support not opposition: The request potentially affects land within Carterton District. However, the NRP only has jurisdiction over the c.m.a. Sites landward of the c.m.a. are within the jurisdiction of territorial local authorities so the relief requested can't be allowed in any event. Even if it could, the submission fails to identify exactly where these sites are within the coastal environment or the values of them that warrant protection. Requests: Confirmation that the requested relief is beyond the jurisdiction of GWRC and should be disallowed.
Schedule M	Community Drinking Water Supply Abstraction Points	Regional Public Health S136/028	Notes that the drinking water register for this area identifies other abstraction points and requests that Schedule M align with the definition of a community drinking water supply – particular sites not shown.	Support in part: Subject to defining the specific sites contemplated by this request and confirmation that they meet the definition. Requests: Confirmation that the sites referred to by the submission meet the definition of community drinking water supply. Subject to that confirmation, allow the submission or such further or other relief as will achieve the same outcome.
Schedule M	Community Drinking Water Supply Abstraction Points	Horticulture NZ S307/081	Delete Maps 26, 27, 27a, 27b and replace with 'community drinking water sources'.	Oppose in part: CDC notes the submitter's other submission points opposing the protections proposed for community

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
				drinking water supply areas. The protection of supply areas supports community health outcomes and is appropriate. Requests: Disallow the submission point.
Schedule M	Community Drinking Water Supply Abstraction Points	Federated Farmers NZ S352/284, S352/286, S352/287	Requests more detailed mapping and risk analysis alongside cost-benefit analysis of options prior to the NRP hearings.	Neither support nor opposition: As a provider of community drinking water, CDC has an interest in ensuring these water sources are appropriately protected. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the mapping or provisions relating to its community drinking water supply areas.
Schedule N	Stormwater Management Strategy	Wellington Water Limited S135/208	Schedule N should be restructured to take a risk management approach and should exclude elements of asset management.	Neither support nor opposition: CDC's own submission requested wholesale deletion of Schedule N. As a local authority responsible for stormwater management assets, CDC has an interest in the Schedule N provisions. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the mapping or Schedule N provisions and associated rules for stormwater management.
Schedule N	Stormwater Management Strategy	Wellington Recreational Marine Fishers Association S32/004	Rewrite Schedule N to give it meaning and delete 'cop-out' phrases	Neither support nor opposition: CDC's own submission requested wholesale deletion of Schedule N. As a local authority responsible for stormwater management assets, CDC has an interest in the Schedule N provisions. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the mapping or Schedule N provisions and associated rules for stormwater management.
Schedule Q	Reasonable and efficient use criteria	Masterton DC S367/008 SWDC S366/008 Fish and Game S308	Delete Schedule Q as applies to group or community water supplies. Delete related policy. Replace it with a target for water allocation in urban water takes (500litres/person/day plus commercial and industrial use allocation). Delete Q Water Races from the Plan	Neither support nor opposition: As a local authority responsible for community drinking water supply, CDC has an interest in the Schedule Q provisions. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the Schedule Q provisions.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
			Replace with wording requested by Submitter S308	
Schedule Q	Reasonable and efficient use criteria	Wellington Water Limited S135/227 and S135/228	<p>Insert a new subsection re reasonable and efficient water use criteria for the supply of essential services.</p> <p>Remove reference to 'maximising water efficiency'.</p>	<p>Neither support nor opposition: As a local authority responsible for community drinking water supply, CDC has an interest in the Schedule Q provisions.</p> <p>Requests: CDC wishes to participate in any further work, discussions or hearings relating to the Schedule Q provisions.</p>

INTRODUCTION & DEFINITIONS

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Definition	<i>Category 2 surface water body</i>	Richard Osborne S384/001 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others (see page 17 of the summary of submissions 'Interpretation')	Request exclusion of water races or, if included, only those over 1m width	<p>Neither support nor opposition: As a local authority responsible for water races, CDC has an interest in the provisions affecting water races.</p> <p>Requests: CDC wishes to participate in any further work, discussions or hearings relating to the question of whether water races are included in or excluded from the definition of Category 2 surface water body and associated rules.</p>
Definition	<i>Category 2 surface water body</i>	SWDC S366/018 Masterton DC S367/018	Delete reference to drains and water races until the appropriate regulatory framework for stormwater and water races has been confirmed using the stated NRP methods	<p>Neither support nor opposition: As a local authority responsible for stormwater drains and water races, CDC has an interest in the provisions affecting water races.</p> <p>Requests: CDC wishes to participate in any further work, discussions or hearings relating to the question of whether drains and water races are included in or excluded from the definition of Category 2 surface water body and associated rules.</p>
Definition	<i>Māori Customary Use (in relation to standards of water quality) is defined as: The interaction of Māori with</i>	CDC S301/018	In the publicly notified GWRC summary of submissions, this submission point is incorrectly summarised (s301/018) as: 'Change definition 'Maori use' to Maori	<p>Support: CDC seeks to clarify the intention of the original submission.</p> <p>Requests: CDC requests more detailed clarification of the expression "Maori practices" used in the definition, given the</p>

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
	<i>fresh and coastal water for cultural purposes, this includes the cultural and spiritual relationships with water expressed through Māori practices, recreation and the harvest of natural materials.</i>		<p><i>customary use</i>' and it is noted that 'Maori use' has been updated to 'Maori customary use' in the PNRP.</p> <p>CDC's submission stated: <i>'CDC requests more detailed clarification of the expression "Maori practices", given the emphasis that is placed on this expression throughout the objectives and policies, and to avoid the potential for confusion and variable interpretation during policy implementation...</i></p>	emphasis that is placed on this expression throughout the objectives and policies, and to avoid the potential for confusion and variable interpretation during policy implementation
Definition	<i>Customary Māori Use</i>	Masterton DC S367/017 SWDC S366/017	Amend the definition to provide greater certainty to its meaning.	Support: CDC shares the submitter's concern about the absence of clarity in the definition of the expression. Requests: Allow the submission and amend the definition to provide clarity and certainty for Plan readers.
Definition	<i>Deficit Irrigation</i>	SWDC S366/023 Masterton DC S367/023	Review and re-write to avoid ambiguity including provision for 'pseudo-deficit' irrigation	Neither support nor opposition: CDC operates a land irrigation facility as an integral component of its wastewater treatment and disposal assets and has an interest in any parameters affecting discharge to land (including the definition of deficit irrigation). Requests: CDC wishes to participate in any further work, discussions or hearings in relation to the definition of ' <i>deficit irrigation</i> '.
Definition	<i>Drain</i>	Masterton DC S367/032 SWDC S366/032 Neville Fisher S12/011 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others (see page 24 summary of submissions 'interpretation')	Exclude water races	Neither support nor opposition: As a local authority responsible for stormwater drains and water races, CDC has an interest in the provisions affecting drains and water races. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the question of whether water races are included in or excluded from the definition of ' <i>drain</i> '.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Definition	<i>Emerging Contaminants</i>	Masterton DC S367/028 SWDC S366/028	Review and rewrite to avoid ambiguity	Support: As a local authority responsible for the disposal of treated wastewater, CDC has an interest in emerging contaminants and shares the submitter's interest in avoiding ambiguity in the definition. Requests: Allow the submission and rewrite the definition to avoid ambiguity.
Definition	<i>Existing Discharge</i>	Wellington Water Limited S135/013	Requests amendment to clarify that it includes wet weather overflows for existing networks	Support: As a local authority responsible for the disposal of treated wastewater, CDC has an interest in the definition and rules for existing discharges. CDC agrees that the definition should capture all flows and wishes to participate in any further work, discussions or hearings relating to the definition of ' <i>existing discharge</i> '. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Definition	<i>Existing Discharge</i>	Masterton DC S367/029 SWDC S366/029	Requests minor editorial amendment	Support: As a local authority responsible for the disposal of treated wastewater, CDC has an interest in the definition and rules for existing discharges. CDC wishes to participate in any further work, discussions or hearings relating to the definition of ' <i>existing discharge</i> '. Requests: Allow the submission point or such further or other relief as is consistent with CDC's other submissions in respect of the definition of ' <i>existing discharge</i> '.
Definition	<i>Field Capacity</i>	Masterton DC S367/022 SWDC S366/022	Review and rewrite to avoid ambiguity	Support: CDC operates a land irrigation facility as an integral component of its wastewater treatment and disposal assets and has an interest in any parameters affecting discharge to land (including the definition of field capacity). Requests: Allow the submission point and CDC wishes to participate in any further work, discussions or hearings in relation to the definition of ' <i>field capacity</i> '.
Definition	<i>Health Needs of People</i>	Fertiliser Association NZ S302/006	Requests deletion	Oppose: The definition provides helpful meaning to the expression used in Objective O6, Policies P114 and P115 and in the rules and is appropriate. Requests: Disallow the submission point.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Definition	Low pressure Spray Irrigation	Masterton DC S366/026 SWDC S367/026	Review and rewrite definition to avoid ambiguity	Neither support nor opposition: CDC operates low pressure spray irrigation equipment as an integral component of its wastewater treatment and disposal assets and has an interest in any parameters affecting discharge to land (including the definition of low pressure spray irrigation). Requests: CDC wishes to participate in any further work, discussions or hearings in relation to the definition of 'low pressure spray irrigation'.
Definition	Mean Annual Low Flow	Dairy NZ and Fonterra S316/016	Amend to: 'the mean annual low flow 7D is the average of lowest daily flows recorded over a 7-day continual flow record, derived for a water year (June-July)'.	Neither support nor opposition: CDC is a consent holder for an existing authorised discharge and has an interest in any parameters affecting that discharge including (including the definition of mean annual low flow). Requests: CDC wishes to participate in any further work, discussions or hearings in relation to the definition of 'mean annual low flow'.
New Definition	Natural Character (of rivers, lakes and wetlands)	Fish and Game S308/007	Requests new definition: <i>The Natural Character of rivers, lakes and wetlands may include such attributes and characteristics as:</i> a) <i>Natural elements, processes and patterns, chemical, biophysical, ecological, geological, geomorphological and morphological aspects;</i> b) <i>Natural landforms;</i> c) <i>The natural movement of water and sediment including hydrological and fluvial processes;</i> d) <i>Places that are wild and scenic;</i> e) <i>A range of natural character from pristine to modified.'</i>	Neither support nor opposition: CDC notes that the expression 'natural character' is not defined in the RMA and is used throughout the PNRP objectives and policies that will be primary considerations for applications for consent (including applications by CDC for the continued operation and maintenance of existing infrastructure assets and for new infrastructure assets). It is not clear where the requested definition is to be used in the policy framework. Requests: CDC wishes to participate in any further work, discussions or hearings in relation to the requested new definition of 'natural character (of rivers, lakes and wetlands)' and use of that expression in any objectives, policies or rules in the PNRP.
Definition	New Discharge	Masterton DC S/367/030 SWDC S/366/030	Requests amendment: <i>A discharge of wastewater from a wastewater treatment plant not previously authorised by resource consent, and does not include a previously</i>	Support in part: CDC's own submission requested amendments to the wording of this definition. Requests: Allow the submission point or such further or other relief that is not inconsistent with the amendments requested

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
			<i>authorised discharge from any part of a wastewater network which has been or is subject to an upgrade, or where the volume of discharge and/or mass load of nutrients and/or concentration of nutrients is proposed to be reduced or maintained at current levels. In the context of wastewater discharged to fresh water from a wastewater treatment plant or a wastewater network means a discharge not authorised by resource consent at the time of application for a resource consent, or a discharge that was authorised by a resource consent at the time of application for a new consent but is to be increased or otherwise altered by a new resource consent</i>	by CDC's own original submission. CDC wishes to participate in any further work, discussions or hearings in relation to the requested amendments to the definition of 'new discharge'.
Definition	<i>Regionally Significant Infrastructure:</i>	Porirua CC S163/030 Roading, Parks & Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council S85/007	Request addition of solid waste disposal facilities as regionally significant infrastructure	Support: Solid waste disposal facilities are essential to support communities. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Definition	<i>Regionally Significant Infrastructure:</i>	Porirua CC S163/030 Roading, Parks & Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council S85/064 and S85/010	Request addition of roads as regionally significant infrastructure or amendment of relevant objectives and policies to ensure they give recognition to district roads equivalent to regionally significant infrastructure.	Support: Roads provide essential infrastructure for communities. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Definition	<i>Regionally Significant Infrastructure:</i>	Wellington City Council S286/014	Requests amendment to include all roads or amendment of relevant objectives and policies to ensure they give recognition to district roads equivalent to regionally significant infrastructure	Support: Roads provide essential infrastructure for communities. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Definition	<i>Regionally Significant Infrastructure:</i>	Masterton DC S367/019 SWDC S366/019	Requests inclusion as regionally significant infrastructure: 'Local Authority Roads, including culverts, bridges, and any other support structures or ancillary infrastructure.'	Support: Roads provide essential infrastructure for communities. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Definition	<i>Regionally Significant Infrastructure:</i>	Wellington Water Limited S135/026	Requests addition of 'local authority water supply network, water treatment plants and intake works' or similar.	Support: The PNRP includes in the definition: ' <i>the local authority water supply network and water treatment plants</i> ' and this is consistent with the RPS definition. It would be helpful to clarify explicitly that this includes water treatment plant and intake works. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Definition	<i>Regionally Significant Infrastructure:</i>	Kaiwairi Dairies S119/046 Neville Fisher S12/001 Michael John Slater S113/056 Mike Moran S400/002 Bernie George S396/002 Sandy Bidwell S399/002 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others (see page 5 onwards of summary of submissions on definitions))	Include water races as regionally significant infrastructure	Neither support nor opposition: CDC operates water races and has an interest in any parameters affecting those. Requests: CDC wishes to participate in any further work, discussions or hearings in relation to the inclusion of water races in the definition of ' <i>regionally significant infrastructure</i> '.
Definition	<i>Regionally Significant Infrastructure:</i>	Federated Farmers NZ S352/042	Requests inclusion of: – river and catchment flood protection schemes – rural drainage infrastructure – rural water infrastructure including water races – rural transport infrastructure	Neither support nor opposition: CDC has an interest in the effective operation of the infrastructure referred to in the submission. Requests: CDC wishes to participate in any further work, discussions or hearings in relation to the inclusion of the named infrastructure in the definition of ' <i>regionally significant infrastructure</i> '.
Definition	<i>Saturated hydraulic conductivity</i>	SWDC S366/025 Masterton DC S367/025	Review and rewrite the definition to avoid ambiguity	Support: CDC operates a land irrigation facility as an integral component of its wastewater treatment and disposal assets and has an interest in any parameters affecting discharge to land (including the definition of saturated hydraulic conductivity).

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
				Requests: Allow the submission point and CDC wishes to participate in any further work, discussions or hearings in relation to the definition of ' <i>saturated hydraulic conductivity</i> '.
Definition	<i>Sensitive Area</i>	Federated Farmers NZ S352/045	Requests deletion of group drinking water supply protection areas	Oppose: The protection of drinking water supply protection areas supports community health and is appropriate. Requests: Disallow the submission point.
Definition	<i>Soil Moisture Deficit</i>	Masterton DC S367/021 SWDC S366/021	Request that the definition is reviewed and re-written to avoid ambiguity	Support: CDC operates a land irrigation facility as an integral component of its wastewater treatment and disposal assets and has an interest in any parameters affecting discharge to land (including the definition of soil moisture deficit). Requests: Allow the submission point and CDC wishes to participate in any further work, discussions or hearings in relation to the definition of ' <i>soil moisture deficit</i> '.
Definition	<i>Stormwater Network</i>	Masterton DC S367/033 SWDC S366/033	Requests inclusion of water races	Neither support nor opposition: CDC is responsible for water races and stormwater management infrastructure and has an interest in the definitions and rules affecting their operation and maintenance. Requests: CDC wishes to participate in any further work, discussions or hearings in relation to whether water races are included in the definition of ' <i>stormwater network</i> '.
Definition	<i>Stormwater Network</i>	SWDC S366/020 Masterton DC S367/020	Requests amendment to provide clarity and recognise differences between the operational requirements of large urban stormwater networks and stormwater management practices in small rural townships.	Neither support nor opposition: CDC is responsible for stormwater management infrastructure assets and has an interest in the definitions and rules affecting their operation and maintenance. Requests: CDC wishes to participate in any further work, discussions or hearings in relation to the definition of ' <i>stormwater network</i> '.
Definition	<i>Zone of Reasonable Mixing</i>	Wellington Recreational Marine Fishers Association S32/059	Requests change to the term 'zone of reasonable mixing'	Neither support not opposition: The primary focus of this submitter is Wellington Harbour. However, amendments made in response to this submission would have implications region-wide.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
				Requests: CDC wishes to participate in any further work, discussions or hearings in relation to any amendment to the definition of zone of reasonable mixing as it relates to discharges to freshwater.

OBJECTIVES AND POLICIES:

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
All Objectives	General Point	Atiawa ki Whakarongotai S398/007	Where practical the Plan should indicate timeframes within which objectives will be delivered	Support in part: CDC's own submission requested reasonable time frames in which to upgrade WWTP systems to remove discharges from streams and to allow continued discharge of treated wastewater to water in specific circumstances. Requests: Allow the submission point to the extent it is consistent with CDC's request for reasonable time frames to allow local authorities to upgrade treatment systems and adjust disposal methods.
Objective	Requested New Objective	Rangitane o Wairarapa Inc S279/063	Insert new objective: <i>'.....Avoid adverse effects on Nga Taonga Nui a Kiwa and outstanding natural landscapes and features (including Outstanding water bodies).</i>	Neither support nor opposition: The absolute 'avoidance' of all adverse effects proposed by this condition sets a higher threshold than the RMA itself. It is also relevant that other submission points have requested inclusion of additional areas within Schedule B (Nga Taonga Nui a Kiwa). In this way, the requested relief potentially captures a much broader range of natural and physical resources including resources that are integral to regionally significant infrastructure. Requests: Subject to achieving clarification of the location and values to be protected by Schedule B, CDC requests retention of the 'cascade' approach adopted elsewhere in the PNRP policy framework of avoidance in the first instance, then remediation or mitigation as appropriate rather than the absolute 'avoidance' approach requested.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Objective O5	Management of water	Fish and Game S308/015	<p>Requests amendment and addition: 'Fresh water bodies and the coastal marine area, as a minimum, are managed to:</p> <ul style="list-style-type: none"> (a) <u>safeguard life supporting capacity and aquatic ecosystem health</u> <ul style="list-style-type: none"> (aa) <u>safeguard mahinga kai</u> (b) <u>recognise and provide for primary contact recreation and Maori customary use, and</u> (c) <u>in the case of fresh water, provide for the health needs of people and</u> (d) <u>recognise and protect natural character including:</u> <ul style="list-style-type: none"> (i) <u>natural elements, processes and patterns;</u> (ii) <u>biophysical, biochemical, ecological, geomorphological and morphological aspects;</u> (iii) <u>the natural movement of water and sediment including hydrological and fluvial processes</u> 	<p>Neither support nor opposition: CDC's own submission requested acknowledgement within Objective O5 of the need to allow time for communities to remove discharges of treated wastewater from surface water and to provide for the continued discharge of treated wastewater to water in specific circumstances. The requested amendments are extensive and CDC has an interest in any amendments to the objective.</p> <p>Requests: Allow the submission point only to the extent that any amendments accommodate the request made in CDC's own submission for acknowledgement of the need to allow time for communities to remove discharges of treated wastewater from surface water and to provide for the continued discharge of treated wastewater to water in specific circumstances. CDC wishes to participate in any further work, discussions or hearings relating to the wording of Objective 5.</p>
Objective O5	Management of Water	<p>Julian and Ruth Blackett S299/021 USNZ S349/021 Land Matters S285/021 Carter Families S295/021 Kennott Family Trust S297/021 Bell Camp Trust S294/021 Max Lutz S348/063 Tim Mansell and Family S351/021 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others).</p>	<p>Amend to delete mahinga kai and add management purpose of 'secondary recreational contact and/or provision of potable water.</p>	<p>Neither support nor opposition: CDC's own submission requested acknowledgement within Objective O5 of the need to allow time for communities to remove discharges of treated wastewater from surface water and to provide for the continued discharge of treated wastewater to water in specific circumstances.</p> <p>Requests: Allow the submission point only to the extent that any amendments accommodate the request made in CDC's own submission for acknowledgement of the need to allow time for communities to remove discharges of treated wastewater from surface water and to provide for the continued discharge of treated wastewater to water in specific circumstances. CDC wishes to participate in any further work, discussions or hearings relating to the wording of Objective 5.</p>

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Objective O8	Beneficial use of water	Fish and Game S308/017	Amend to ensure the take and use of watering, including its assimilative capacity, occurs within environmental limits which achieve the freshwater objectives in relation to non-consumptive values including safeguarding life supporting capacity and ecosystem health and processes, cultural values, natural character, mahinga kai, indigenous species, and the habitat of trout and recreational values including primary contact recreation and angling	Oppose: The matters referred to in the submission point are addressed already by other objectives and policies. Requests: Disallow the submission point.
Objective O8	Beneficial use of water	Rangitane o Wairarapa S279	Requests deletion of Objective O8	Oppose: The matters referred to in Objective O8 are legitimate and necessary to support sustainable management. Requests: Disallow the submission point.
Objective O11	Maori Customary Use	SWDC S366/039 Masterton DC S367/039	Delete objective O11 or define 'Maori customary use' to provide certainty as to the implications of the definition	Support: CDC shares the submitter's concern about the need for greater clarity in the definition of this expression. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Objectives O17, O19, O22	Natural Character	Fish and Game S308/018	Amend to: <u>'Recognise and preserve aquatic habitat diversity and quality, including the form, frequency and, pattern of pools, runs, and riffles in rivers, and the natural form of rivers, lakes, natural wetlands and coastal habitats. Recognise and preserve freshwater habitats that are important to the life cycle and survival of aquatic species. Avoid effects of land use activities and activities on the margins of freshwater bodies and their beds at times which will affect the breeding, spawning, and dispersal or migration of aquatic species. Avoid activities and the placement of structures in the bed of freshwater environments which would create barriers to the migration or movement of indigenous</u>	Oppose in part: Section 6 (a) of the RMA requires recognition and provision for the preservation of the <i>natural character</i> of water and not the features themselves. Requests: Disallow the submission point.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
			<i>aquatic species. Restore natural character including the connections between fragmented aquatic habitats where degraded.'</i>	
Objective O19	Natural processes	CentrePort S121/026 KiwiRail Holdings S140/018 Horticulture NZ S307/016 Wellington International Airport S282/011 Rangitane o Wairarapa S279/030	Amend: ' The interference <i>adverse effects from use and development on natural process is minimised-avoided, remedied or mitigated.'</i>	Support: The submission raises a valid concern about the ambiguity of the expression 'interference'. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
3.5 Water Quality Objectives		Fish and Game S308/148, S308/012, S308/149, S308/021, S308/022,S308/024, S308/023	Delete Table 3.2. amend Objective O30 to manage water to the standards recommended in Fish and Game's Tables 3.1 to 3.4a by 2030	Oppose in part: CDC is concerned that the 2030 deadline proposed for achievement of the standards is unachievable and unreasonable. CDC also considers that the limits proposed for some of the parameters in the tables are unachievable or unreasonable. CDC opposes imposition of the limits as end-of-pipe receiving water standards. Requests: Disallow the submission point or such further or other relief as will address the concerns raised by CDC.
Objective O23	Maintain or improve water quality	Wairarapa Regional Irrigation Trust S127/008 Dairy NZ and Fonterra S316/031 Horticulture NZ S307/017 Federated Farmers S352/073	Amend: ' <i>the overall quality of water in the region's rivers, lakes, natural wetlands...is maintained or improved.'</i> To be consistent with the NPS FM	Support: The NPSFM does not require this outcome for all water bodies in all circumstances. Rather, the NPSFM addresses 'overall' water quality in the region. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Objective O24	Contact recreation and maori customary use	Rangitane o Wairarapa Inc 279/035	Amend to ensure that all water bodies in the region are suitable for primary contact recreation and a date no later than 2030 is added to define when the objective's outcomes are to be met	Oppose in part: CDC is concerned that the proposed primary contact recreation standard is unachievable for all water bodies (for example, including drains) in all circumstances. However, CDC agrees it is appropriate for parts of catchments particularly in summer periods. Requests: Disallow the submission point or such further or other relief as will address CDC's concern.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Objective O24	Contact recreation and maori customary use	Atiawa ki Whakarongotai S398/011	Require, as a minimum, primary contact recreation objective and add parameters to ensure water quality provides for life supporting capacity, ecosystem health, recreation, maori customary use and natural character	Oppose in part: CDC is concerned that the proposed primary contact recreation standard is unachievable for all water bodies (for example, including drains) in all circumstances. However, CDC agrees it is appropriate for parts of catchments particularly in summer periods. Requests: Disallow the submission point or such further or other relief as will address CDC's concern.
Table 3.4		Royal Forest and Bird Protection Society S353/031, S353/002	Add SIN, DO, deposited sediment, non-indigenous macrophyte standards to Table 3.4 objectives for rivers.	Oppose in part: CDC is concerned that any in-river receiving water objectives or standards imposed through the PNRP are achievable and reasonable. CDC also opposes the imposition of the suggested limits as end-of-pipe receiving water standards. Requests: Disallow the submission point or such further or other relief as will address the concerns raised by CDC. CDC wishes to participate in any further work, discussions or hearings relating to the values included in Table 3.4 and the way in which Table 3.4 is employed in the policies and rules of the PNRP.
Table 3.4 and Objective O25	Safeguarding aquatic ecosystem health and mahinga kai	Wairarapa Regional Irrigation Trust S127/010 Horticulture NZ S307/020	Amend Table 3.4 to provide a measurable environmental outcome and replace numerical values with qualitative environmental outcomes	Neither support nor opposition: In the absence of explicit wording for the requested qualitative environmental outcomes, CDC registers its interest in any amendments to Table 3.4. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the values included in Table 3.4 and the way in which Table 3.4 is employed in the policies and rules of the PNRP.
Objective O25	Safeguarding aquatic ecosystem health and mahinga kai	Minister of Conservation S75/028	Include in Table 3.4 an objective relating to channel water surface area cover by non-indigenous macrophytes (less than 50% of cross-sectional area or volume or less than 50% of channel water surface area); include a deposited sediment percent cover for all outstanding water bodies and Schedule F1 water bodies (less than 20% cover of the bed	Oppose in part: CDC is concerned that any in-river receiving water objectives or standards imposed through the PNRP are achievable and reasonable. CDC also opposes the imposition of the suggested limits as end-of-pipe receiving water standards. Requests: Disallow the submission point or such further or other relief as will address the concerns raised by CDC. CDC wishes to participate in any further work, discussions or hearings relating to the values included in Table 3.4 and the

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
			by fine silt or sand under 2mm diameter or within 10% cover of reference condition).	way in which Table 3.4 is employed in the policies and rules of the PNRP.
Objective O25	Safeguarding aquatic ecosystem health and mahinga kai	Fish and Game S308/027	Amend to safeguard life supporting capacity and ecosystem health and processes, protect natural character and to safeguard mauri of freshwater and mahinga kai. Amend to ensure freshwater states are maintained where the Table 3.4 standards are already achieved and improved by 2030 where they are currently not achieved	Neither support nor opposition: In the absence of explicit wording for the requested outcomes, CDC registers its interest in any amendments to Objective O25 and Table 3.4. Requests: CDC wishes to participate in any further work, discussions or hearings relating to Objective O25, the values included in Table 3.4 and the way in which Table 3.4 is employed in the policies and rules of the PNRP.
Objective O25	Safeguarding aquatic ecosystem health and mahinga kai	Rangitane o Wairarapa Inc. S279/036	Clarify in (c) that water bodies that do not meet the objectives in the tables are to be enhanced to meet the objectives by 2030	Oppose: CDC is concerned that the 2030 deadline is unachievable for all water bodies, particularly if the Table 3.4 values are to be imposed as absolute limits. Requests: Disallow the submission point.
Objective O46	Discharges to Land	Masterton DC S367/059 SWDC S366/059 Powerco S29/009	Amend: <i>'Discharges to land are managed to reduce the adverse effects of runoff or leaching of contaminants to water.'</i>	Support: The submitter's point is valid. The focus should be on the effects of concern and not the activity itself. Requests: Allow the submission point.
Objective O46	Discharges to land	Rangitane o Wairarapa S279/056	Amend: <i>'Discharges to land are managed to avoid the runoff or leaching of contaminants to water where those contaminants, by themselves or in combination with other contaminants, will cause the freshwater objectives and limits in this Plan to be exceeded.'</i>	Neither support nor opposition: CDC notes that a number of submissions have requested amendments to the limits included in the PNRP and it is not entirely clear what limits this submission point is referring to. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the setting of water quality standards, limits or targets referred to in Objective O46.
Objective O48	Stormwater networks	Wellington Water Limited S135/224	Focus on the effects of the discharge, rather than on managing the asset and restrict to matters within the stormwater network manager's control	Support: The focus should be on the effects of the discharge rather than on the activity itself. Requests: Allow the submission point.
Objective O48	Stormwater networks	Trelissick Park Group S88/003	Amend to include a mandatory zero effects of stormwater runoff for new developments	Oppose in part: The requested 'zero' effects is not required by the RMA and is potentially unachievable and unreasonable in all circumstances. Achievement of hydraulic neutrality may

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
				be appropriate in some circumstances but not universally (for example, stormwater discharges from individual properties in rural townships such as Carterton are appropriate and have no significant adverse environmental effects). Requests: Disallow the submission point.
Objective O50	Discharges of wastewater	Atiawa ki Whakarongotai S398/013	Discharge of human effluent to water should be prohibited	Oppose: CDC is concerned that 100% removal of treated wastewater from all waterways is unachievable within the foreseeable future and particularly for small rural local authorities. The PNRP wording of Objective O50 ('progressive reduction') is more appropriate. Requests: Disallow the submission point.
Objective O50	Discharges of wastewater	Porirua Harbour Catchment Community Trust S33	Requests amendment to: ' <i>discharges of wastewater to fresh water are progressively reduced eliminated.</i> '	Oppose: Although the submitter is focusing on Porirua Harbour, this requested change would apply region-wide. CDC is concerned that 100% removal of treated wastewater from all waterways is unachievable within the foreseeable future and particularly for small rural local authorities. The PNRP wording of Objective O50 ('progressive reduction') is more appropriate. Requests: Disallow the submission point.
Objective O50	Discharges of wastewater	SWDC S366/062 Masterton DC S367/062	Confirm that 'progressively reduced' does not mean within the life of the Plan and can be up to 35 years where appropriate	Support: CDC shares the submitter's concern that complete removal of treated wastewater discharges from freshwater receiving environments is unachievable within the 10-year life of the PNRP. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Objective O50	Discharges of wastewater	Rangitane o Wairarapa S279	Requests phasing out of all discharges by 2030	Oppose: CDC is concerned that the time frame proposed is not achievable or realistic. Requests: Disallow the requested phase-out time frame of 2030.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Policies	Requested New Policy	Fish and Game S308/040 and S308/041	Amend provisions so that the objectives of the Plan are achieved and, in particular, the section 3 tables.	Neither support nor opposition: In the absence of explicit amendments in this submission point, CDC registers its interest in any amendments to the section 3 tables. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the values included in the section 3 tables.
Policies	Requested New Policy	Rangitane o Wairarapa Inc S279/154	<i>'Consistent with Objective O1, the taking and use of fresh water shall be managed in an integrated manner with associated land uses and discharges by considering and making decisions on resource consent applications for land use, water use and discharges together (at the same time) to ensure that the freshwater objectives and freshwater limits will be met.'</i>	Support in part: CDC endorses the integrated approach proposed by the suggested wording. However, it is not entirely clear what limits the submission point refers to and CDC is opposed to the imposition of the limits included in the Section 3 tables as 'end-of-pipe' receiving water standards. Requests: Clarification of the specific limits to be referenced in the objective and clarification of how those limits are to be implemented. CDC wishes to participate in any further work, discussions or hearings relating to the requested new Objective.
Policy P4	Minimising adverse effects	NZTA S146/076	Requests amendments including consideration of the operational requirements and functional needs of regionally significant infrastructure (and other improvements to wording)	Support: CDC agrees that the operational requirements and functional needs of regionally significant infrastructure should be explicitly referenced. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Policy P4	Minimising adverse effects	Ravensdown S310/023	Requests amendments including consideration of the operational requirements and functional needs of regionally significant infrastructure	Support: CDC agrees that the operational requirements and functional needs of regionally significant infrastructure should be explicitly referenced. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Policy P4	Minimising adverse effects.	Rangitane o Wairarapa	Delete and make consequential changes to other policies that rely on this policy	Neither support nor opposition: In the absence of explicit wording in this submission point, CDC registers its interest in any amendments to Policy P4. Requests: Allow the submission only to the extent that any amendments to Policy P4 are not inconsistent with CDC's original submission on Policy P4.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Policy P7	Beneficial uses of water	Royal Forest & Bird Protection Society S353 Rangitane o Wairarapa S279	Requests deletion of recognition of beneficial uses of water (including for disposal of wastewater and stormwater)	Oppose: The submission overlooks the fact that freshwater bodies are integral to regionally significant infrastructure networks. Requests: Disallow the submission point.
Policy P8	Beneficial activities within waterways	Royal Forest & Bird Protection Society S353	Requests deletion of 'h' <i>'maintenance and use of existing structures in the coastal marine area, natural wetlands and the beds of rivers and lakes'</i>	Oppose in part: Many structures, including gauging stations, are essential components of regionally significant infrastructure. Request: Disallow the submission point in part by providing for essential infrastructure within the beds of rivers.
Policy P12	Benefits of regionally significant infrastructure	NZTA S146/082 Vector Gas S145/028 Only in respect of (e): Kiwi Rail Holdings S140/032	Amend: <i>'The benefits of regionally significant infrastructure and REG... are recognised and provided for by having regard to taking into account:</i> <i>(a)...</i> <i>(b) the investment in and the location of existing infrastructure and structures and</i> <i>(c) ...</i> <i>(d) the functional need for port activities and other regionally significant infrastructure to be located within the c.m.a. and the coastal area and</i> <i>(e) the functional need for regionally significant infrastructure to be located over, under, within, and adjacent the beds of rivers and lakes, and</i> <i>....</i> <i>(f)...</i> <i>(g) the safe, efficient and effective use of the Strategic Transport Network</i>	Neither support nor opposition: The requests relate primarily to pipe infrastructure and highways. However, there is some relevance for CDC's WWTP discharge assets and CDC addressed Policy P12 in its original submission. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the wording of Policy P12. For discussion with CDC.
Policy P12	Benefits of regionally significant infrastructure	Rangitane o Wairarapa S279/079	Amend to clarify that the operation, use, maintenance and upgrade can still have adverse effects that need to be managed; and add a new policy to ensure that new or increases in scale or extent of existing regionally significant infrastructure and REG	Support in part: CDC acknowledges that adverse effects have to be managed in accordance with the Plan policy framework. However, CDC opposes the requested approach of 'avoidance' only of all effects of new or upgraded infrastructure.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
			shall avoid adverse effects on sites in Schedules A to F, H and J.	Requests: Replace the expression 'avoid adverse effects' with the 'cascade' approach adopted elsewhere in the PNRP of avoiding significant adverse effects in the first instance, then remedying and mitigating other adverse effects. Alternatively, grant such further or other relief as will achieve the same outcome.
Policy P13	Benefits of regionally significant infrastructure	Rangitane o Wairarapa S279/080	Amend to clarify that the operation, use, maintenance and upgrade can still have adverse effects that need to be managed; and add a new policy to ensure that new or increases in scale or extent of existing regionally significant infrastructure and REG shall avoid adverse effects on sites in Schedules A to F, H and J.	Support in part: CDC acknowledges that adverse effects have to be managed in accordance with the Plan policy framework. However, CDC opposes the requested approach of 'avoidance' only of all effects of new or upgraded infrastructure. Requests: Replace the expression 'avoid adverse effects' with the 'cascade' approach adopted elsewhere in the PNRP of avoiding significant adverse effects in the first instance, then remedying and mitigating other adverse effects. Alternatively, grant such further or other relief as will achieve the same outcome.
Policy P13	Benefits of regionally significant infrastructure	NZTA S146/083 Vector Gas S145/029 NZTA S146/083	Amend to include use, operation, maintenance, upgrade <u>and development</u> of regionally significant infrastructure. <i>Also add: 'The development of new regionally significant infrastructure and renewable energy generation activities to meet the needs of the community are beneficial and are generally appropriate.'</i>	Support: CDC agrees that the development of new regionally significant infrastructure is essential to support community wellbeing subject to avoiding, remedying or mitigating significant adverse effects. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
4.2	Beneficial use and development	Hutt City Council S84/004	Include a schedule and/or map of the Strategic Transport Network, to provide clarity as to what infrastructure is identified as regionally significant. Extend provisions for regionally significant infrastructure to other types of infrastructure.	Neither support nor oppose: As a local authority responsible for a road network, CDC registers its interest in any schedule or map identification of the strategic transport network. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the inclusion of any maps or schedule identifying a strategic transport network and to any

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
				provisions facilitating or constraining the operation and maintenance of that network.
New Policy		Wellington City Council S286/001	Include a new policy: <i>'Recognise the contribution existing urban areas, identified urban growth areas and infrastructure make to the social, economic and cultural wellbeing of people and communities and provide for their ongoing use and development.'</i>	Support: CDC agrees that it is appropriate to acknowledge the important contribution of the physical resources and infrastructure within urban areas. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
General		Wellington City Council S286/005	Review the use of non-complying activity status where activities, structures and infrastructure are an expected part of the environment and in areas that have been identified by territorial authorities as urban development areas.	Support: CDC shares the submitter's concern about the constraining effect of the non-complying activity status. Requests: Allow the submission point.
Policy P7	Uses of land and water	CT and EM Brown S13/003	Identify and recognise stormwater channels in the NRP. Provide for their maintenance by Councils and landowners by making this a permitted activity in the NRP.	Support: CDC agrees that stormwater channels and drains (including water races) are essential in supporting community wellbeing. Requests: Allow the submission point.
Policy P7	Uses of land and water	Sophie Mormede S68/005	Amend so that a water body is not seen as a cleaning, dilution or disposal means of wastewater	Oppose: To the extent that the submission point relates to <i>treated</i> wastewater, it fails to acknowledge the important beneficial uses of water for regionally significant infrastructure. Requests: Disallow the submission point.
Policy P7	Uses of land and water	Friends of Taputeranga Marine Reserve	Remove or soften relating to the use of fresh water body as cleaning, dilution and disposal of waste water	Oppose: To the extent that the submission point relates to <i>treated</i> wastewater, it fails to acknowledge the important beneficial uses of water for regionally significant infrastructure. Requests: Disallow the submission point.
Policy P7	Uses of land and water	Rangitane o Wairarapa Inc. S279/074	Delete P7	Oppose: It is appropriate to recognise and provide for the important beneficial uses of water in supporting community health and wellbeing. Requests: Disallow the submission point.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Policy P7	Uses of land and water	Masterton DC S367/068 SWDC S366/068	Amend so that the beneficial uses of water: <i>'...shall be recognised <u>and provided for.</u>'</i>	Support: It is appropriate to recognise and provide for the important beneficial uses of water in supporting community health and wellbeing. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Policy P8	Beneficial Activities	Wellington Water Ltd S135/055	Add public water supply, protection of the community and property from flooding by stormwater networks and protection of public health by maintaining and operating a wastewater network and disposal system.	Support in part: It is appropriate to recognise and provide for regionally significant infrastructure that supports community health and wellbeing. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Policy P14	Activities incompatible with regionally significant infrastructure	Rangitane o Wairarapa S279/081	Amend to clarify that the operation, use, maintenance and upgrade can still have adverse effects that need to be managed; and add a new policy to ensure that new or increases in scale or extent of existing regionally significant infrastructure and REG shall avoid adverse effects on sites in Schedules A to F, H and J.	Support in part: CDC acknowledges that adverse effects have to be managed in accordance with the Plan policy framework. However, CDC opposes the requested approach of 'avoidance' only of all effects of new or upgraded infrastructure. Requests: Replace the expression 'avoid adverse effects' with the 'cascade' approach adopted elsewhere in the PNRP of avoiding significant adverse effects in the first instance, then remedying and mitigating other adverse effects. Alternatively, grant such further or other relief as will achieve the same outcome.
Policy P19	Maori Values	Rangitane o Wairarapa S279	Requests amend 'minimised' to 'avoided'	Oppose: S. 6 (e) of the RMA requires recognition and provision for these values but does not require complete avoidance of effects. Requests: Disallow the submission point.
Policy P25	Natural Character	NZTA S146/090 Vector Gas S145/033	Amend: <i>'Use and development shall <u>avoid, remedy or mitigate significant</u> adverse effects on natural character in the coastal marine area....and in the beds of lakes and rivers, and avoid remedy or mitigate other adverse effects of activities taking into account....</i> (a) <i>Whether it is practicable to protect natural character from inappropriate use and</i>	Support in part: The proposed approach departs from the 'cascade' approach adopted by the PNRP but incorporates some important considerations in relation to regionally significant infrastructure that CDC supports. Requests: Allow the submission or such further or other relief as will achieve the same outcome.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
			<p>development through the use and development is appropriate after considering:</p> <p>(i) Using an the use of alternative locations, or form of development that would be more appropriate to that location; and</p> <p>(ii) Considering the extent to which functional need or existing use limits location and development options; and</p> <p>(iii) Considering the extent to which functional need or existing use limits location and development options; and</p> <p><u>Whether the use and development is regionally significant infrastructure</u></p>	
Policy P25	Natural Character	Minister of Conservation S75/058	Amend: '(d) whether it is practicable the ability to protect natural character from inappropriate use and development through:	<p>Oppose in part: The RMA requires protection from inappropriate use and development – not absolute protection in all circumstances. Consideration of practicability is appropriate (and particularly for regionally significant infrastructure and other essential infrastructure that supports community wellbeing).</p> <p>Requests: Retain the original proposed PNRP wording of Policy P25.</p>
Policy P25	Natural Character	Fish and Game S308	Requests amendment to incorporate 9 principles and seeks protection and avoidance of adverse effects	<p>Oppose in part: The proposed wording adopts an 'avoidance' approach that is not consistent with the scheme of the RMA.</p> <p>Requests: Disallow the submission point or, alternatively, ensure that any amendments to the wording of Policy P25 are consistent with the 'cascade' approach adopted by the PNRP (avoid in first instance, then remedy and mitigate including by offsetting residual adverse effects).</p>

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Policy P26	Natural Processes	NZTA S146/091 Vector Gas S145/074 Horticulture NZ S307/036 Wellington International Airport S282/034 Rangitane o Wairarapa S279/091	Amend: 'Use and development will be managed to minimise avoid, remedy or mitigate [adverse] effects on the integrity and functioning of natural processes.'	Support: CDC agrees that the submitters' proposed approach is more consistent with the RMA. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Policy P26	Natural Processes	Royal Forest and Bird Protection Society S353/067	Amend to require avoidance of all significant effects; and for all other effects adopt a cascade of (1) avoid in first instance, (2) remedy if can't avoid, and (3) mitigate if can't remedy and (4) offset residual adverse effects.	Oppose: The proposed approach is at odds with the alternative 'cascade' approach preferred by CDC that is proposed in the submissions of NZTA, Vector and others. Requests: Disallow the requested policy approach of requiring avoidance of all significant effects (and particularly, for regionally significant infrastructure and other essential infrastructure that supports community wellbeing).
Policy P31	Aquatic ecosystem health and mahinga kai	Fish and Game S308/055 Rangitane o Wairarapa S279/092	Amend to replace 'minimise' with 'avoid'	Oppose: The request sets an unreasonably high threshold, particularly for regionally significant infrastructure that is essential to support community wellbeing). Requests: Disallow the submission point.
Policy P32	Aquatic ecosystem health and mahinga kai	Trelissick Park Group S88/009	Include a mandatory zero effects on stormwater runoff for any new developments	Oppose in part: The requested 'zero' effects is not required by the RMA and is potentially unachievable and unreasonable in all circumstances. Achievement of hydraulic neutrality may be appropriate in some circumstances but not universally (for example, stormwater discharges from individual properties in rural townships such as Carterton are appropriate and have no significant adverse environmental effects). Requests: Disallow the submission point.
Policy P32	Aquatic ecosystem health and mahinga kai	Atiawa ki Whakarongotai S398/020	Delete policy; include provisions that respond to adverse cumulative effects – minimising adverse cumulative effects and avoiding significant cumulative effects	Neither support nor opposition: In the absence of explicit wording, CDC registers its interest in any amendments to the wording of Policy P32 addressing cumulative effects. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the wording of Policy P32.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Policy P32	Aquatic ecosystem health and mahinga kai	Fish and Game S308/056	Delete entirely	Neither support nor opposition: The policy provides useful guidance for the management of adverse effects on the stated values and should be retained. Requests: Retain Policy P32. CDC wishes to participate in any further work, discussions or hearings relating to the wording of Policy P32.
Policy P32	Aquatic ecosystem health and mahinga kai	RFBPS S353/071	Replace P32 with two policies that maintain water quality and manage to limits and targets proposed in the submission.	Neither support nor opposition: Policy P32, as worded in the PNRP, provides useful guidance for the management of adverse effects on the stated values and should be retained. CDC is opposed to the imposition of limits from Section 3 tables as end-of-pipe standards. Requests: Retain Policy P32. CDC wishes to participate in any further work, discussions or hearings relating to the wording of Policy P32.
Policy P45		Rangitane o Wairarapa S279/105	Amend to require avoidance of all adverse effects on Schedule C sites	Oppose: Policy P45 adopts a 'cascade' approach to managing adverse effects which better provides for sustainable management than the strict 'avoidance' approach proposed by the submission. CDC acknowledges that adverse effects have to be managed in accordance with the Plan policy framework. However, CDC opposes the requested approach of 'avoidance' of all adverse effects of new or upgraded infrastructure. Requests: Disallow the submission point.
4.8	Discharges to land	Mt Victoria Residents' Association S162/009	Requests inclusion of conditions for discharges of wastewater and stormwater that sets financial penalties where local councils exceed contaminant standards	Oppose: Although the focus of the submission is probably Wellington Harbour, the request has implications for all councils including Wairarapa local authorities and is unreasonable. Requests: Disallow the submission point.
Policy P62	Promoting Discharges to Land	Rangitane o Wairarapa S279/113	Amend to ' Promoting <u>Requiring discharges to land.</u> <u>The discharge of contaminants to land shall occur is promoted over direct discharges to water....'</u>	Oppose: CDC's own submissions have sought acknowledgement that shifting to land discharge will take time. The submitters' request is not immediately achievable or always practicable (e.g. in Wellington, Hutt Valley). Requests: Disallow the submission point.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Policy P63	Improving water quality for contact recreation and Maori customary use	Wellington Water Ltd S135/063	Recognise and provide for stormwater discharges as regionally significant infrastructure, recognising the widespread long-term benefits to people and property.	Support: CDC agrees that it is appropriate to provide for stormwater discharges from local authority networks recognising the essential role they play in supporting the health and safety and wellbeing of communities. Requests: Allow the submission point.
Policy P63	Improving water quality for contact recreation and Maori customary use	Fish and Game S308/060 Rangitane o Wairarapa S279/114	Amend to require management for primary, not secondary, contact recreation; and Requests 2030 time frame	Oppose: The requested amendment this sets a much higher threshold for water bodies (including water bodies that provide beneficial use for regionally significant infrastructure). CDC is concerned that the requested 2030 time frame for achievement of water quality improvement is not achievable. Requests: Disallow the submission points in respect of the Waiohine River and Mangatarere Stream.
Policy P67	Minimising effects of discharges	Rangitane o Wairarapa S279/119 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others)	Amend to: <i>'the adverse effects of discharges of contaminants to land and water will be minimised avoided, remedied or mitigated...'</i>	Support: The proposed wording better reflects the regime of the RMA. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Policy P68	Inappropriate discharges to water	Wellington Water Ltd S135/083	Change 'extreme weather related overflows' exception to 'heavy rainfall events'; and Specify if (c) (plant failure) includes discharges from wastewater or potable water treatment plants	Support: The policy needs to provide reasonably for the exceptional events described in the submission. It is not possible for any wastewater collection network (including manholes) or treatment system to guarantee avoidance of discharge of some untreated wastewater in these extreme and unforeseeable events. Requests: Subject to establishing an appropriate definition for 'heavy rainfall event, allow the submission point or such further or other relief as will achieve the same outcome.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Policy P68	Inappropriate discharges to water	Rangitane o Wairarapa S279/120	Delete exception for extreme weather-related overflows or wastewater system failures	Oppose: It is not possible for any wastewater collection network (including manholes) or treatment system to guarantee avoidance of discharge of some untreated wastewater in extreme and unforeseeable events. Requests: Disallow the submission point.
Policy P70	Managing point source discharges	Rangitane o Wairarapa S279/122	Ensure improvements to existing discharges are time bound, meaningful and measurable; clarify that the policy does not apply to new point source discharges of wastewater or other contaminants that are culturally offensive to Maori	Oppose in part: CDC's original submission on the PNRP addressed Policy P70 and requested clarification of the definition of 'new discharge'. Requests: Allow the submission point only to the extent that any amendments accommodate the requests made in CDC's original submission for clarification of the scope of 'new discharges' (and, particularly whether upgrading of existing treatment systems or discharge points should be captured by the definition, policies (including Policy P70) and rules.
Policy P71	Quality of discharges	Minister of Conservation S75/085, S75/086, S75/087, S75/088	Amend pH standard to ensure discharges are not changing the pH of downstream receiving environment OR remove that standard; apply the higher clarity standard of 20% to all outstanding water bodies; Apply more cautionary DO standards in (b) and (c) for Schedule F1 water bodies – e.g. 7-day mean minimum 7 mg/L and 1-day minimum 5mg/L; include ScBOD5 standard of maximum 2mg/L; POM maximum 5mg/L at flows less than median; and minimum toxicity standards for nitrate and ammonia	Oppose in part: CDC is concerned that any in-river receiving water objectives or standards imposed through the PNRP are achievable and reasonable. CDC also opposes the imposition of the suggested limits as end-of-pipe receiving water standards. CDC notes that part of the request relates only to outstanding water bodies but also notes the submissions of others that have requested the inclusion of additional rivers and streams in the schedule of outstanding water bodies. Requests: Disallow the submission point or such further or other relief as will address the concerns raised by CDC. CDC wishes to participate in any further work, discussions or hearings relating to the values included in the PNRP or referenced through Policy P71.
Policy P71	Quality of discharges	Fish and Game S308/065	Apply the Table 3.4 and 3.4a values from their submission	Oppose in part: CDC is concerned that any in-river receiving water objectives or standards imposed through the PNRP are achievable and reasonable. CDC also opposes the imposition of the suggested limits as end-of-pipe receiving water standards. Requests: Disallow the submission point or such further or other relief as will address the concerns raised by CDC. CDC

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
				wishes to participate in any further work, discussions or hearings relating to the values included in Table 3.4 and the way in which Table 3.4 (and any amendment including a Table 3.4a) is employed in the policies and rules of the PNRP.
Policy P73	Minimising adverse effects of stormwater discharges	CT and EM Brown S13/011 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others)	Amend: <i>The adverse effects of stormwater discharges shall be minimised, including by:</i> ... <i>(b) Taking a source control and treatment train approach to new and existing activities.</i>	Oppose: The approach advocated by the submission is not always practicably for existing development. Requests: Disallow the submission point.
Policy P73	Minimising adverse effects of stormwater discharges	Trelissick Park Group	Requests mandatory zero effects of stormwater runoff from any new developments	Oppose in part: The requested 'zero' effects is not required by the RMA and is potentially unachievable and unreasonable in all circumstances. Achievement of hydraulic neutrality may be appropriate in some circumstances but not universally (for example, stormwater discharges from individual properties in rural townships such as Carterton are appropriate and have no significant adverse environmental effects). Requests: Disallow the submission point.
Policy P73	Minimising adverse effects of stormwater discharges	Rangitane o Wairarapa S279/123	The discharge of human sewage via stormwater to water is not appropriate and should be resolved as soon as practicable and not later than by 2030	Support in part: CDC agrees that removal of untreated wastewater from local authorities' stormwater networks should be achieved wherever practicable. For that reason, CDC commits annual funding to the progressive detection and resolution of inflows of wastewater to the stormwater network. The challenge is ongoing and is not one that will practicably be able to be eliminated completely by 2030. Detection and resolution will need to continue beyond 2030. Requests: Subject to clarification of what the submitter intends by the expression 'resolving' wastewater contamination of stormwater, CDC seeks the relief requested in its original submission (deletion of Policy P73 or, alternatively, amendment to clarify that P73 addresses significant adverse effects and not <i>all</i> adverse effects including effects that are minor or less than minor.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Policy P73	Minimising adverse effects of stormwater discharges	Wellington Water Ltd S135/089	The policy should focus on the effects of the discharges and not on managing the network. Amend so that it is written with explicit matters of assessment rather than a prescription of asset management activities.	Support in part: The focus of Policy P73 should be on the significant adverse effects of stormwater discharges. Requests: Allow the submission point in a manner consistent with the relief requested in CDC's original submission on Policy P73.
Policy P83	Avoiding new discharges of wastewater to water	Rangitane o Wairarapa S279/134	Impose a 2030 timeframe and ensure existing discharges meet freshwater limits and targets.	Oppose in part: CDC expects its treated wastewater discharge to be able to comply with the PNRP freshwater quality standards by 2030 but also that the discharge of treated wastewater to surfacewater will still be required during winter months. Requests: Disallow the requested limit of 2030 for existing (or new) discharges of treated wastewater to surfacewater.
Policy P83	Avoiding new discharges of wastewater to water	Wellington Water S135/097	Amend definitions of existing and new wastewater network discharges; change 'avoid' to allow for discretionary activity status for such discharges from regionally significant infrastructure whose purpose is to protect public health.	Support: CDC supports the discretionary activity consent status for applications for discharge permits for existing and new discharge of treated wastewater to water. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
Policy P91	Landfills	Rangitane o Wairarapa S279/126	Amend to avoid, in the first instance, discharges from landfills – rather than minimising.	Oppose: It is not practicable to avoid all discharges from existing (often long-established) landfills including closed landfills. Requests: Disallow the submission point.
P113	Water Allocation	Royal Forest & Bird Protection Society S353	Opposes proposed core allocation limits and requests lower limits	Neither support nor opposition: The requested amendment has potential implications for CDC's abstraction for community drinking water supply purposes. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the water allocation framework for the Kaipatangata catchment.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
Policy 118	Reasonable and efficient water use	Masterton DC S367/096 SWDC S366/096	Amend P118 (a) to delete requirement for existing users when replacing existing water take permits to meet the Schedule Q criteria within 4 years.	Support: CDC agrees that the requirement is unreasonable in the time frame proposed. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.

RULES:

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
General	Requested new rule	Rangitane o Wairarapa S279/180	Insert a new discretionary activity rule that applies to discharges to water that do not meet the conditions of other rules and are not provided for in other rules	Support: This accords with the request made in CDC's original submission for discretionary activity, as opposed to non-complying activity status as the default consent category for activities that do not comply with permitted, controlled or restricted discretionary activity standards. Requests: Allow the submission point.
R36	Permitted agricultural discharges	Horticulture NZ S307	Requests deletion of prohibition on spraying agricultural chemicals where it could discharge into water within a community drinking water supply protection area;	Oppose: CDC operates a community drinking water supply and is concerned to ensure water quality within the supply area is protected. Requests: Disallow the submission point.
R42	Permitted discharges	Fish and Game S308/086	Apply the standards recommended in relation to Policy P71	Oppose in part: CDC is concerned that any in-river receiving water objectives or standards imposed through the PNRP are achievable and reasonable. CDC also opposes the imposition of the suggested limits as end-of-pipe receiving water standards. Requests: Disallow the submission point or such further or other relief as will address the concerns raised by CDC. CDC wishes to participate in any further work, discussions or hearings relating to the values included in any Tables referenced through Policy P71 or Rule R42.
R45	Potable water permitted discharge	Masterton DC S367/104 SWDC S366/104	Amend maximum concentration of free or combined residual chlorine to 1.5 mg/m ³ (instead of 0.3mg/m ³)	Oppose in part: CDC is responsible for the supply of potable water and has an interest in any parameters constraining discharge from any part of its network. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the limits on chlorine contamination included in Rule R45.
R47	Dye or salt tracer controlled activity	Rangitane o Wairarapa S279/168, S279/169	Amend to ensure that the relationship of Maori and the culture and traditions are recognised and provided for; and amend to include as a	Neither support nor opposition: The use of dye and salt tracer is essential to the effective maintenance of infrastructure, including regionally significant infrastructure.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
			matter of control effects on sites listed in Schedules A to F and H	CDC registers its interest in any amendments to the controlled matters within Rule R47. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the wording of Rule R.47.
5.2.3	Stormwater	Roading, parks HCC and UHCC S85/076 Wellington CC S286/043 Wellington Water Ltd S135/142	Clarify how rules R48-53 relate to stormwater runoff from the roading network and ensure that no resource consent is required	Support: CDC supports permitted activity provision for stormwater runoff from the road network. Requests: Allow the submission point or such further or other relief as will achieve the same outcome.
R48	Stormwater	Trelissick Park Group S88/004	Include a mandatory zero effects on stormwater for any new developments	Oppose in part: The requested 'zero' effects is not required by the RMA and is potentially unachievable and unreasonable in all circumstances. Achievement of hydraulic neutrality may be appropriate in some circumstances but not universally (for example, stormwater discharges from individual properties in rural townships such as Carterton are appropriate and have no significant adverse environmental effects). Requests: Disallow the submission point.
R48	Stormwater	Mahaki Holdings S370/062 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others)	Delete R48	Oppose: Rule R48 is important for individual properties and is more sustainable in rural townships than a fully reticulated stormwater collection and disposal network. Requests: Disallow the submission point.
R48	Stormwater	Porirua CC S163/087	Restructure the rule so that there is an option to address the stormwater from individual properties as part of the global consents for the Council stormwater network and associated stormwater management strategy.	Neither support nor opposition: CDC registers its interest in any changes to the provisions of Rule R48. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the wording of Rule R48.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
R49	Stormwater	Trelissick Park Group S88/0045	Include a mandatory zero effects on stormwater for any new developments	Oppose in part: The requested 'zero' effects is not required by the RMA and is potentially unachievable and unreasonable in all circumstances. Achievement of hydraulic neutrality may be appropriate in some circumstances but not universally (for example, stormwater discharges from individual properties in rural townships such as Carterton are appropriate and have no significant adverse environmental effects). Requests: Disallow the submission point.
R49	Stormwater from individual property	David Wilson S70/002	Insert an additional condition requiring any stormwater treatment and discharge system to be operated and maintained in accordance with the system design specification or, if there is no design specification, the requirements of Auckland Council Technical Publication No. 10	Oppose: The requirement may be impracticable or unduly onerous for many existing individual property stormwater discharges. Requests: Disallow the submission point.
R50	Stormwater from local authority network	David Wilson S70/005	Do not limit consent durations to 5 years – suggests 2 years after notification of the Whaitua objectives	Oppose: CDC's original submission requested the deletion of Rule R50 pending conclusion of the further work planned pursuant to Method M15 of the PNRP. Requests: Disallow the submission point and grant the relief requested in CDC's own original submission.
R50	Stormwater from local authority network	Te Runanga o Toa Rangatira S326/010	Iwi should be notified of these controlled activity applications	Oppose: CDC's original submission requested the deletion of Rule R50 pending conclusion of the further work planned pursuant to Method M15 of the PNRP. Requests: Disallow the submission point and grant the relief requested in CDC's own original submission.
R53	All other stormwater discharges	Porirua CC S163/091	Restructure the rules to allow stormwater runoff from local authority roading that is not connected to the council stormwater network to be addressed as part of the global consents for the councils stormwater network	Neither support nor opposition: CDC registers its interest in any changes to the provisions of Rule R48. Requests: CDC wishes to participate in any further work, discussions or hearings relating to the wording of Rule R48.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
R58		SWDC S366/107	Requests deletion of R58 so as to provide for the ongoing use of the water race network as a permitted activity (not a discretionary activity as proposed by R58).	Support: CDC supports the permitted activity consent status for the operation and maintenance of water races. Requests: Allow the submission point or such other relief as will achieve the same outcome.
R61	Existing wastewater discharges – discretionary activity	Wellington Recreational Marine Fishes Assoc. S32/037	Requests stand-alone rule setting a limit on endocrine chemical discharged to land	Oppose in part: Subject to clarification of the proposed limit intended by the submitter, CDC notes that the science regarding the effects of endocrine contamination is emerging. CDC does not consider that a stand-alone rule is required and registers its interest in the wording of any rules relating to endocrine chemical contamination. Requests: Disallow the submission point or, alternatively, CDC wishes to participate in any further work, discussions or hearings relating to rules addressing endocrine chemical contamination.
R61	Existing wastewater discharges – discretionary activity	Nga Hapu o Otaki S309/035	Amend R61 to be at discretion of mana whenua values	Oppose: The RMA requires the weighing of competing values. It would be inappropriate to promote a single value ahead of all other Part 2 matters as requested by the submitter. The RMA already provides an appropriate framework for decision-making. Requests: Disallow the submission point.
R61	Existing wastewater discharges – discretionary activity	Fish and Game S308/088	Amend to require existing discharge activities to achieve the objectives in their amended Tables 3.4 and 3.4a by 2030 and make all discharges after 2030 non-complying activities	Oppose: CDC opposes the implementation of the Section 3 tables as end-of-pipe receiving water standards and is concerned that the time frame will be unachievable for some local authorities. Requests: Disallow the submission point.
R61	Existing wastewater discharges – discretionary activity	Masterton DC S367/108 SWDC S366/108 Hutt CC S84/023	Amend to make all discharge (not just existing discharges) discretionary activities.	Support: This accords with the request made in CDC's original submission for discretionary activity, as opposed to non-complying activity status as the default consent category for activities that do not comply with permitted, controlled or restricted discretionary activity standards. Requests: Allow the submission point.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
R61	Existing wastewater discharges – discretionary activity	Rangitane o Wairarapa S279/177	Provide for discretionary activity status for existing discharges only up until 2030 and non-complying thereafter	Oppose: CDC's original submission requested discretionary activity, as opposed to non-complying activity status as the default consent category for activities that do not comply with permitted, controlled or restricted discretionary activity standards – with no time limit. The discretionary activity status allows for full consideration of all relevant matters. Requests: Disallow the submission point.
R62		Nga Hapu o Otaki S309/053 Rangitane o Wairarapa S279/178	Make new discharges of wastewater to water prohibited activities	Oppose: As noted in CDC's original submission, the removal of all treated wastewater from all surface water bodies at all times is not expected to be achievable within the life of the PNRP let alone immediately (which is the effect of the requested amendment). Requests: Disallow the submission point.
R62	New wastewater discharges – non-complying activity	Wellington Recreational Marine Fishes Assoc. S32/037	Requests stand-alone rule setting a limit on endocrine chemical discharged to land	Oppose in part: Subject to clarification of the proposed limit intended by the submitter, CDC notes that the science regarding the effects of endocrine contamination is emerging. CDC does not consider that a stand-alone rule is required and registers its interest in the wording of any rules relating to endocrine chemical contamination. Requests: Disallow the submission point or, alternatively, CDC wishes to participate in any further work, discussions or hearings relating to rules addressing endocrine chemical contamination.
R76	Controlled activity status for new or upgraded on-site wastewater systems	Federated Farmers NZ S352	Requests deletion of controlled activity status for new or upgraded on-site wastewater systems within community drinking water supply protection areas (reasons are that there is no evidence of compromised drinking water quality or threats to water quality).	Oppose: CDC operates a community drinking water supply and is concerned to ensure water quality within the supply area is protected. Requests: Disallow the submission point or such further or other relief as will ensure the protection of water quality within community drinking water supply protection areas.
R79		Fish and Game S308/090	Require discharges to achieve the table 3.4, 3.4a objectives by 2030 and make applications	Oppose: CDC's original submission requested discretionary activity, as opposed to non-complying activity status as the default consent category for activities that do

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
			non-complying if they fail to meet these after 2030	not comply with permitted, controlled or restricted discretionary activity standards – with no time limit. CDC also opposes the imposition of the values in the Section 3 tables as end-of-pipe standards. The discretionary activity status allows for full consideration of all relevant matters. Requests: Disallow the submission point.
R79		Masterton DC S367/113 SWDC S366/113	Delete R79 and replace with a permitted activity rule	Support in part: CDC's original submission supported controlled activity in preference to the discretionary activity status mooted in the draft NRP. However, as discussed with GWRC staff during the preparation of the NRP, if appropriate standards could be prescribed to address all potential adverse effects of land irrigation of treated wastewater (and CDC expects this is achievable), the permitted activity status is reasonable. If the region is to make meaningful progress on shifting the disposal of treated wastewater from surface water to land, the NRP needs to enable land discharge and not create unnecessary consenting hurdles. Request: CDC requests that further work be done to explore specification of appropriate standards that would enable provision for land irrigation of treated wastewater as a permitted activity.
R80	Discharge of treated wastewater to land that does not meet controlled activity =Restricted Discretionary Activity	Fish and Game S308/091	Amend to require applicants to meet the Table 3.4 and 3.4a objectives by 2030	Oppose: CDC opposes the imposition of the values in the Section 3 tables as absolute limits or as end-of-pipe standards. Requests: Disallow the submission point.
R92	All discharges to land within community drinking water protection areas – restricted discretionary activity	Minister of Conservation S75/138	Amend R92 to exclude its application to rules R36 (agricultural chemicals), R87 (land-based discharge of vertebrate toxic agents), R88 (aerial application of vertebrate toxic agents)	Oppose in part: CDC is concerned about the potential risks to community health associated with allowing the requested exceptions within community drinking water supply areas. Requests: Disallow the submission point in respect of community drinking water supply areas.
R92	All discharges to land within community drinking water supply protection areas not	Federated Farmers NZ S352	Requests deletion	Oppose: CDC operates a community drinking water supply and is concerned to ensure water quality within the supply area is protected.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
	otherwise permitted = restricted discretionary activity			Requests: Disallow the submission point or such further or other relief as will ensure the protection of water quality within community drinking water supply protection areas.
R92	All discharges to land within community drinking water protection areas – restricted discretionary activity	Horticulture NZ S307/068	Requests amended wording	Support in part: The requested relief appears to retain restricted discretionary activity status (as originally proposed by Rule R92) for discharges within community drinking water supply areas. Provided appropriate assessment criteria are included, CDC supports that approach so as to protect community health. Requests: Subject to confirmation of the wording of the restricted matters, allow the submission point.
R92	All discharges to land within community drinking water protection areas – restricted discretionary activity	Julian and Ruth Blackett S299.070, S299/052 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others)	Delete Rule R92; and Apply the provisions only to new allotments and not existing sites.	Oppose in part: Rule R92 addresses the discharge of a wide range of contaminants not otherwise provided for by the rules. Other rules permit or provide for discharges with limited adverse effects. The discharge of contaminants to land beyond the scope of that otherwise provided for, within community drinking water supply areas, should be carefully considered whether that occurs on new or existing sites. Requests: Disallow the submission point.
R93	All other discharges to land = full discretionary activity	Horticulture NZ S307/069	Amend R93 to make these restricted discretionary	Oppose: CDC is satisfied that full discretionary activity status is appropriate for discharges that are not otherwise provided for. Requests: Disallow the submission point.
R126-R128	Damming, Reclamation within outstanding water bodies	Royal Forest & Bird Protection Society S353	Requests change consent of status of damming, reclamation within outstanding water bodies (rivers, lakes, wetlands) from non-complying to prohibited	Oppose in part: CDC notes the submissions of others that request inclusion of the entire Mangatarere Stream catchment in the schedule of outstanding water bodies. The requested consent status change would have implications for the in-stream structures supporting CDC's Kaipatangata community drinking water supply if that stream is included as an outstanding water body.

PNRP Reference	Policy or Provision	Submission References	Decisions Requested by Submission and Reasons	CDC's Position, Reasons and Requested Decision
				<p>Requests: Disallow the submission point to the extent that it relates to the CDC community drinking water supply abstraction point in the Kaipatangata Stream.</p>