

APPENDIX A: ASSESSMENT OF RELEVANT PROVISIONS FROM POLICY STATEMENTS AND PLANS

Table 1: New Zealand Coastal Policy Statement 2010

Key Objectives / Policies	Relevance	Assessment
<p>Ecosystems / Natural character / Water quality</p> <p><u>Objective 1</u></p> <p>To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land, by:</p> <ul style="list-style-type: none"> maintaining or enhancing natural biological and physical processes in the coastal environment and recognising their dynamic, complex and interdependent nature; protecting representative or significant natural ecosystems and sites of biological importance and maintaining the diversity of New Zealand’s indigenous coastal flora and fauna; and maintaining coastal water quality, and enhancing it where it has deteriorated from what would otherwise be its natural condition, with significant adverse effects on ecology and habitat, because of discharges associated with human activity. <p><u>Objective 2</u></p> <p>To preserve the natural character of the coastal environment and protect natural features and landscape values through:</p> <ul style="list-style-type: none"> recognising the characteristics and qualities that contribute to natural character, natural features and landscape values and their location and distribution; identifying those areas where various forms of subdivision, use, and development would be inappropriate and protecting them from such activities; and encouraging restoration of the coastal environment. 	<p>Several stormwater discharges are directly to the coastal environment and the coastal environment is the indirect receiving environment for other stormwater discharges.</p>	<p>The discharges occur at a variety of locations in the coastal environment. Given the nature of the discharges, and the various other sources of similar contaminants, it is difficult to determine the contribution that the discharge of stormwater makes to any adverse effects on the coastal environment. It is noted however, that:</p> <ul style="list-style-type: none"> The SMS describes how Wellington Water will minimise contamination from discharges from the local authority stormwater networks. This will be achieved through implementing two new targeted workstreams: Workstream 1 will deliver universal responses and water quality programmes and Workstream 2 will deliver SCaMPs and resulting capital improvements. . The Sub-Catchment Management Plans (SCaMP) are designed to develop a programme of stormwater network improvement works to reduce the adverse effects of stormwater discharges for each sub-catchment over the term of the consent. <p>The SMS will set out the prioritisation of sub-catchments for the preparation and implementation of SCaMPs. Implementation of the SCaMPs will over the term of the consent assist in safeguarding the integrity, form, functioning and resilience of the coastal environment, sustaining its ecosystems and preserving natural character.</p>

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<p><u>Policy 11: Indigenous biological diversity</u></p> <p>To protect indigenous biological diversity in the coastal environment:</p> <p>a) avoid adverse effects of activities on:</p> <ul style="list-style-type: none"> i. indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification System lists; ii. taxa that are listed by the International Union for Conservation of Nature and Natural Resources as threatened; iii. indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare; iv. habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare; v. areas containing nationally significant examples of indigenous community types; and vi. areas set aside for full or partial protection of indigenous biological diversity under other legislation; and <p>b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on:</p> <ul style="list-style-type: none"> i. areas of predominantly indigenous vegetation in the coastal environment; ii. habitats in the coastal environment that are important during the vulnerable life stages of indigenous species; iii. indigenous ecosystems and habitats that are only found in the coastal environment and are particularly vulnerable iv. to modification, including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass and saltmarsh; v. habitats of indigenous species in the coastal environment that are important for recreational, commercial, traditional or cultural purposes; vi. habitats, including areas and routes, important to migratory species; and 		

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<p>vii. ecological corridors, and areas important for linking or maintaining biological values identified under this policy.</p> <p><u>Policy 13: Preservation of natural character</u></p> <p>1. To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:</p> <ul style="list-style-type: none"> a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment; including by: c) assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and d) ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions. <p>2. Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as:</p> <ul style="list-style-type: none"> a) natural elements, processes and patterns; b) biophysical, ecological, geological and geomorphological aspects; c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; d) the natural movement of water and sediment; e) the natural darkness of the night sky; f) places or areas that are wild or scenic; g) a range of natural character from pristine to modified; and h) experiential attributes, including the sounds and smell of the sea; and their context or setting. <p><u>Policy 21: Enhancement of water quality</u></p> <p>Where the quality of water in the coastal environment has deteriorated so that it is having a significant adverse effect on ecosystems, natural habitats, or water based recreational activities, or is restricting existing</p>		<p>In relation to Policy 13, it is considered that given the stormwater discharges from the local authority stormwater network are intermittent, temporary, and of short duration, and taking into account the state of the receiving environment during these events, any adverse effects will not prevent the natural character of the receiving environments from being preserved.</p> <p>The SMS and the SCaMPs are designed to set out how the consent holder will reduce the adverse effects of the stormwater discharges from the local authority stormwater network.</p> <p>The implementation of the SCaMPs which will contain the programme of improvement works and initiatives, will assist in enhancing water quality in the coastal environment where it has deteriorated to the extent that it is having a moderate or high adverse effect. The adverse</p>

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<p>uses, such as aquaculture, shellfish gathering, and cultural activities, give priority to improving that quality by:</p> <ul style="list-style-type: none"> (a) identifying such areas of coastal water and water bodies and including them in plans; (b) including provisions in plans to address improving water quality in the areas identified above; (c) where practicable, restoring water quality to at least a state that can support such activities and ecosystems and natural habitats; (d) requiring that stock are excluded from the coastal marine area, adjoining intertidal areas and other water bodies and riparian margins in the coastal environment, within a prescribed time frame; and (e) engaging with tangata whenua to identify areas of coastal waters where they have particular interest, for example in cultural sites, wāhi tapu, other taonga, and values such as mauri, and remedying, or, where remediation is not practicable, mitigating adverse effects on these areas and values. <p><u>Policy 23</u></p> <p>1. In managing discharges to water in the coastal environment, have particular regard to:</p> <ul style="list-style-type: none"> a. the sensitivity of the receiving environment; b. the nature of the contaminants to be discharged, the particular concentration of contaminants needed to achieve the required water quality in the receiving environment, and the risks if that concentration of contaminants is exceeded; and c. the capacity of the receiving environment to assimilate the contaminants; and d. avoid significant adverse effects on ecosystems and habitats after reasonable mixing; e. use the smallest mixing zone necessary to achieve the required water quality in the receiving environment; and f. minimise adverse effects on the life-supporting capacity of water within a mixing zone. <p>2. In managing discharge of human sewage, do not allow:</p>		<p>effects on coastal water quality will be reduced over the life of the consent.</p> <p>In terms of Policy 23 clause 1, information relevant to clauses (a) to (c) is included in the AEE. The AEE identifies that stormwater discharges from the local authority stormwater network are expected to continue to contribute to the cumulative effects on the water quality and ecology of the coastal environment. These effects will be reduced through the proposed SMS and SCaMP process.</p> <p>In terms of Policy 23 clause 2, there are limited sources of wastewater contamination covered within this consent (there are other consents that will address this). The implementation of the SMS and SCaMPs will reduce the adverse effects on water quality from the stormwater discharges across the extent of the global consent and in each sub-catchment. As part of the SMS, Wellington Water will implement workstreams to respond to acute human health risks resulting from stormwater discharges, similar to requirements in the Stage 1 consent. Wellington Water is continuing to develop these workstreams based on lessons learnt during the implementation of the stage 1</p>

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<p>a. discharge of human sewage directly to water in the coastal environment without treatment; and</p> <p>b. the discharge of treated human sewage to water in the coastal environment, unless:</p> <ul style="list-style-type: none"> i. there has been adequate consideration of alternative methods, sites and routes for undertaking the discharge; and ii. informed by an understanding of tangata whenua values and the effects on them. 		<p>consent. More information will be provided prior to the hearing.</p> <p>Based on the above assessments it is considered the proposal is generally consistent with the NZCPS's objectives and policies relating to ecosystems, natural character and water quality.</p>
<p>Tangata whenua</p> <p><u>Objective 3</u></p> <p>To take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment by:</p> <ul style="list-style-type: none"> • recognising the ongoing and enduring relationship of tangata whenua over their lands, rohe and resources; • promoting meaningful relationships and interactions between tangata whenua and persons exercising functions and powers under the Act; • incorporating mātauranga Māori into sustainable management practices; and • recognising and protecting characteristics of the coastal environment that are of special value to tangata whenua. <p><u>Policy 2: The Treaty of Waitangi, tangata whenua and Māori</u></p> <p>In taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi), and kaitiakitanga, in relation to the coastal environment:</p> <p>a) recognise that tangata whenua have traditional and continuing cultural relationships with areas of the coastal environment, including places where they have lived and fished for generations;</p> <p>b) involve iwi authorities or hapū on behalf of tangata whenua in the preparation of regional policy statements, and plans, by undertaking effective consultation with tangata whenua; with such consultation to</p>		<p>Wellington Water is working to ensure that tangata whenua are active partners in resolving issues associated with stormwater discharges from the local authority stormwater network. By doing so, Wellington Water is seeking to ensure that:</p> <ul style="list-style-type: none"> • the concept of kaitiakitanga • the cultural relationship of tangata whenua to the environments impacted by the stormwater discharges • the principles of the Treaty of Waitangi <p>are central to the implementation of the consent. It is seeking to achieve this through several mechanisms.</p> <p>In the first instance, a review of Te Mahere Wai o Te Kāhui Taiao and of the Ngāti Toa Rangatira statement on Te Awarua-o-Porirua Whaitua Implementation Programme has been undertaken as part of this application to identify potential effects on cultural values. This assessment identifies the fresh and coastal water values held by Ngāti Toa and Taranaki Whānui.</p> <p>Wellington Water is proposing that a full review of the Stormwater Monitoring Plan (SMP) will be undertaken by 2025 which will involve introducing a Mātauranga Māori element. This new element to the SMP will provide a detailed understanding of the values held by tangata whenua for freshwater and coastal water (expected to include mauri, mahinga kai and sites of significance), and</p>

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<p>be early, meaningful, and as far as practicable in accordance with tikanga Māori;</p> <p>c) with the consent of tangata whenua and as far as practicable in accordance with tikanga Māori, incorporate mātauranga Māori in regional policy statements, in plans, and in the consideration of applications for resource consents, notices of requirement for designation and private plan changes;</p> <p>d) provide opportunities in appropriate circumstances for Māori involvement in decision making, for example when a consent application or notice of requirement is dealing with cultural localities or issues of cultural significance, and Māori experts, including pūkenga², may have knowledge not otherwise available;</p> <p>e) take into account any relevant iwi resource management plan and any other relevant planning document recognised by the appropriate iwi authority or hapū and lodged with the council, to the extent that its content has a bearing on resource management issues in the region or district; and</p> <p style="padding-left: 20px;">i. where appropriate incorporate references to, or material from, iwi resource management plans in regional policy statements and in plans; and</p> <p style="padding-left: 20px;">ii. consider providing practical assistance to iwi or hapū who have indicated a wish to develop iwi resource management plans;</p> <p>f) provide for opportunities for tangata whenua to exercise kaitiakitanga over waters, forests, lands, and fisheries in the coastal environment through such measures as:</p> <p style="padding-left: 20px;">i. bringing cultural understanding to monitoring of natural resources;</p> <p style="padding-left: 20px;">ii. providing appropriate methods for the management, maintenance and protection of the taonga of tangata whenua;</p> <p style="padding-left: 20px;">iii. having regard to regulations, rules or bylaws relating to ensuring sustainability of fisheries resources such as taiāpure, mahinga mātaimai or other non commercial Māori customary fishing;</p> <p>g) in consultation and collaboration with tangata whenua, working as far as practicable in accordance with tikanga Māori, and recognising</p>		<p>how these values are impacted by the stormwater discharges. In addition, Wellington Water proposes to seek feedback from a Mātauranga Māori expert, or other party agreed to by Te Rūnanga o Toa Rangatira and Taranaki Whānui, as part of its updates of the SMS, and preparation of each SCaMP to ensure that the impacts on these tangata whenua values are progressively reduced through this consent.</p> <p>The Collaborative Committee is central to Wellington Water’s proposal. This Committee will comprise an equal number of members from tangata whenua and the consent holder. The overall purpose of the Collaborative Committee is to provide strategic direction to the consent holder to reduce the adverse effects of stormwater discharges over the term of the consent. To help achieve this purpose the functions of the Collaborative Committee in relation to stormwater discharges will include:</p> <ul style="list-style-type: none"> • Overseeing updates to and implementation of the Stormwater Management Strategy • Overseeing the preparation and implementation of the Sub-catchment Management Plans • Overseeing the preparation of the Mātauranga Māori Monitoring Plan • Reviewing the Annual Report • Overseeing the preparation, updating, and implementation of the community engagement plan. <p>The Collaborative Committee structure has been designed to facilitate opportunities for tangata whenua to exercise kaitiakitanga with respect to stormwater discharges.</p> <p>Based on the above assessment it is anticipated that the Collaborative Committee, SMS and SCaMPs will assist in meeting these NZCPS provisions. It is acknowledged however that this needs to be determined by tangata whenua.</p>

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<p>that tangata whenua have the right to choose not to identify places or values of historic, cultural or spiritual significance or special value:</p> <ul style="list-style-type: none"> i. recognise the importance of Māori cultural and heritage values through such methods as historic heritage, landscape and Cultural Impact Assessments; and ii. provide for the identification, assessment, protection and management of areas or sites of significance or special value to Māori, including by historic analysis and archaeological survey and the development of methods such as alert layers and predictive methodologies for identifying areas of high potential for undiscovered Māori heritage, for example coastal pā or fishing villages. 		
<p>Public access and recreation <u>Objective 4</u></p> <p>To maintain and enhance the public open space qualities and recreation opportunities of the coastal environment by:</p> <ul style="list-style-type: none"> • recognising that the coastal marine area is an extensive area of public space for the public to use and enjoy; • maintaining and enhancing public walking access to and along the coastal marine area without charge, and where there are exceptional reasons that mean this is not practicable providing alternative linking access close to the coastal marine area; and • recognising the potential for coastal processes, including those likely to be affected by climate change, to restrict access to the coastal environment and the need to ensure that public access is maintained even when the coastal marine area advances inland. 	<p>Local authority stormwater network discharges are one source of contaminants that can potentially negatively impact on recreation values of the coastal environment.</p>	<p>It is considered that the application is generally consistent with this objective. The AEE assesses the recreational effects as none, very low or low for all of the sub-catchments except Island/ Houghton which is assessed as moderate. The SMS (universal measures and work streams), the development and implementation of the SCaMPs, and acute human health mitigation measures will reduce the adverse effects on recreation over the term of the consent.</p> <p>However, it needs to be recognised that improvement in the stormwater discharges covered by this application will not on their own ensure recreation values are enhanced. This is because the restrictions on recreation opportunities are caused by a variety of factors not just these local authority stormwater network discharges.</p>
<p>Use and development <u>Objective 6</u></p> <p>To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that:</p>		<p>The local authority stormwater network discharges are part of the operation of the stormwater network, which is 'regionally significant infrastructure' and important to community health and wellbeing.</p> <p>A key purpose of local authority stormwater network is to collect, convey and discharge stormwater runoff from impervious surfaces efficiently to prevent ponding and</p>

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<ul style="list-style-type: none"> • the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits; • some uses and developments which depend upon the use of natural and physical resources in the coastal environment are important to the social, economic and cultural wellbeing of people and communities; • functionally some uses and developments can only be located on the coast or in the coastal marine area; • the coastal environment contains renewable energy resources of significant value; • the protection of habitats of living marine resources contributes to the social, economic and cultural wellbeing of people and communities; • the potential to protect, use, and develop natural and physical resources in the coastal marine area should not be compromised by activities on land; • the proportion of the coastal marine area under any formal protection is small and therefore management under the Act is an important means by which the natural resources of the coastal marine area can be protected; and • historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use, and development. 		<p>flooding in sensitive areas and to create an integrated network to support the community's wellbeing.</p> <p>Where urban environments are located near to the coast there is generally a functional need for stormwater discharges to be located within the coastal environment. This is because it is generally not feasible to locate the discharge outside of the coastal environment, given distance topography, gradient etc.</p> <p>Effects of stormwater discharges on the coastal environment will be progressively reduced through the implementation of the SMS and SCaMPs.</p> <p>Future development will be required to align with the SMS (e.g. universal measures) and SCaMPs, or where a SCaMP does not exist prepare its own, and thereby minimise any new adverse effects on the coastal environment.</p> <p>Overall, it is considered that the proposal is aligned with these provisions.</p>

Table 2: National Policy Statement for Freshwater Management 2020

Key Objectives / Policies	Relevance	Assessment
<p>Te Mana o te Wai</p> <p><u>Concept</u></p> <p>(1) Te Mana o te Wai is a concept that refers to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. It protects the mauri of the wai. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community.</p> <p>(2) Te Mana o te Wai is relevant to all freshwater management and not just to the specific aspects of freshwater management referred to in this National Policy Statement.</p> <p><u>Framework</u></p> <p>(3) Te Mana o te Wai encompasses 6 principles relating to the roles of tangata whenua and other New Zealanders in the management of freshwater, and these principles inform this National Policy Statement and its implementation.</p> <p>(4) The 6 principles are:</p> <ul style="list-style-type: none"> (a) Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater (b) Kaitiakitanga: the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations (c) Manaakitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others (d) Governance: the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future 	<p>The Te Mana o te Wai concept, framework, objective and policy are relevant to all freshwater management decisions. Many of the local authority stormwater network discharges are to freshwater environments.</p>	<p>The application recognises the importance of protecting the health of freshwater (consistent with Te Mana o te Wai) through the SMS and the requirement to prepare and implement the SCaMPs. The SCaMPs will establish improvement programmes and the SMS will set out which sub-catchments to prioritise for development of SCaMPs.</p> <p>The development and implementation of the SCaMPs will be overseen by the Collaborative Committee.</p> <p>The Collaborative Committee has been designed to give effect to Te Mana o te Wai principles of mana whakahaere, kaitiakitanga and manaakitanga which will inform the development of the SCaMPs and the prioritisation of sub-catchments and improvement works.</p> <p>The implementation of the consent in accordance with the proposed conditions should generally assist in giving effect to Te Mana o te Wai.</p>

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<p>(e) Stewardship: the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations</p> <p>(f) Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation.</p> <p>(5) There is a hierarchy of obligations in Te Mana o te Wai that prioritises:</p> <ul style="list-style-type: none"> (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future. <p><u>Objective</u></p> <p>(1) The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:</p> <ul style="list-style-type: none"> (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future. <p><u>Policy 1</u></p> <p>Freshwater is managed in a way that gives effect to Te Mana o te Wai.</p>		
<p>Freshwater quality, values and habitats</p> <p><u>Policy 5</u></p> <p>Freshwater is managed through a National Objectives Framework to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.</p> <p><u>Policy 6</u></p> <p>There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.</p>	<p>Many network discharges are to freshwater and have the potential to effect freshwater quality, values and habitats.</p>	<p>The application generally aligns with these policies. Three outstanding waterbodies are directly affected by urban stormwater discharges. These are the Taupō Swamp Complex, the Pauatahanui Inlet Tidal Flats, and the Pauatahanui Inlet Saltmarsh. The SCaMPs that are to be developed and implemented through the consent will ensure that that adverse effects on, and degradation of, freshwater bodies are reduced overtime. The SMS will be used to prioritise the development and implementation of SCaMPs. Where sub-catchments are identified as containing outstanding water bodies or being degraded as a result of</p>

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<p><u>Policy 7</u> The loss of river extent and values is avoided to the extent practicable.</p> <p><u>Policy 8</u> The significant values of outstanding water bodies are protected.</p> <p><u>Policy 9</u> The habitats of indigenous freshwater species are protected.</p> <p><u>Policy 10</u> The habitat of trout and salmon is protected, insofar as this is consistent with Policy 9.</p> <p><u>Policy 13</u> The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.</p>		<p>stormwater discharges, it is anticipated that these values will be taken into account in the prioritisation of SCaMPs..</p> <p>Any adverse effects that currently occur should be reduced over time with the implementation of the SMS and SCaMPs. The universal measures in the SMS will help to ensure that new development does not result in the further loss of river or wetland values in the interim period before a SCaMP for the relevant sub-catchment is prepared. Therefore, it is expected that any further loss of freshwater values as a consequence of the stormwater discharges should be avoided and that the SCaMPs should progressively contribute to the reduction of adverse effects on freshwater values over time, relative to the current state, so that the protection of indigenous biodiversity values is not prevented by the discharges.</p>
<p>Integrated management</p> <p><u>Policy 3</u> Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.</p>	<p>This objective promotes integrated management which is what the proposal is seeking to achieve over the longer term.</p>	<p>The proposal strongly aligns with this objective as through the implementation of the SMS and SCaMPs there will be a focus on an integrated catchment based and sub-catchment approach to the management of stormwater network discharges.</p>
<p>Tangata whenua</p> <p><u>Policy 2</u> Tangata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for.</p>	<p>Various overflows discharge to freshwater and have the potential to effect tangata whenua values and interests.</p>	<p>Wellington Water is working to ensure that tangata whenua are active partners in resolving issues associated with stormwater discharges from the local authority stormwater network. It is seeking to achieve this through several mechanisms.</p> <p>In the first instance, a review of Te Mahere Wai o Te Kāhui Taiao and of the Ngāti Toa Rangatira statement on Te Awarua-o-Porirua Whaitua Implementation Programme has been undertaken as part of this application to identify</p>

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		<p>potential effects on cultural values. This assessment identifies the fresh and coastal water values held by Ngāti Toa and Taranaki Whānui.</p> <p>Wellington Water is proposing that a full review of the Stormwater Monitoring Plan (SMP) will be undertaken in 2025 which will involve introducing a Mātauranga Māori element. This new element to the SMP will provide a detailed understanding of the values held by tangata whenua for freshwater and coastal water, and how these values are impacted by the stormwater discharges. In addition, Wellington Water proposes to seek feedback from a Mātauranga Māori expert, or other party agreed to by Te Rūnanga o Toa Rangatira and Taranaki Whānui, as part of its updates of the SMS, and preparation of each SCaMP.</p> <p>In combination these measures will ensure that Māori freshwater (coastal water) values are identified and provided for in the implementation of the consent, in a manner consistent with this provision.</p> <p>In terms of ensuring that tangata whenua is actively involved in freshwater management, it is noted that the Collaborative Committee is central to Wellington Water’s proposal. This Committee will comprise an equal number of members from Mana Whenua and the consent holder. The overall purpose of the Collaborative Committee is to provide strategic direction to the consent holder to reduce the adverse effects of stormwater discharges over the term of the consent. To help achieve this purpose the functions of the Collaborative Committee in relation to stormwater discharges will include:</p> <ul style="list-style-type: none"> • Overseeing updates to and implementation of the Stormwater Management Strategy • Overseeing the preparation and implementation of the Sub-catchment Management Plans • Overseeing the preparation of the Mātauranga Māori Monitoring Plan • Reviewing the Annual Report

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		<ul style="list-style-type: none"> Overseeing the preparation, updating, and implementation of the community engagement plan. <p>The Collaborative Committee structure has been designed to recognise the role of tangata whenua as kaitiaki.</p> <p>Based on the above assessment it is anticipated that the Collaborative Committee, SMS and SCaMPs will assist in meeting Policy 2. It is acknowledged however that this needs to be determined by Mana Whenua.</p>

Table 3: Operative Regional Policy Statement for the Wellington Region 2013

Key Objectives / Policies	Relevance	Assessment
<p>Coastal environment</p> <p><u>Objective 3</u> Habitats and features in the coastal environment that have significant indigenous biodiversity values are protected; and Habitats and features in the coastal environment that have recreational, cultural, historical or landscape values that are significant are protected from inappropriate subdivision, use and development.</p> <p><u>Objective 4</u> The natural character of the coastal environment is protected from the adverse effects of inappropriate subdivision, use and development.</p> <p><u>Objective 5</u> Areas of the coastal environment where natural character has been degraded are restored and rehabilitated.</p> <p><u>Objective 6</u> The quality of coastal waters is maintained or enhanced to a level that is suitable for the health and vitality of coastal and marine ecosystems.</p> <p><u>Objective 7</u> The integrity, functioning and resilience of physical and ecological processes in the coastal environment are protected from the adverse effects of inappropriate subdivision, use and development.</p> <p><u>Policy 35: Preserving the natural character of the coastal environment – consideration</u> When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional</p>	<p>Several stormwater discharges are directly to the coastal environment and the coastal environment is the indirect receiving environment for other stormwater discharges.</p>	<p>The stormwater discharges occur at a variety of locations in the coastal environment. Given the nature of the discharges, and the various other sources of similar contaminants, it is very difficult to determine the contribution, if any, that stormwater discharges make to any adverse effects on the coastal environment. It is noted however, that:</p> <ul style="list-style-type: none"> • The SMS describes how Wellington Water will minimise contamination from discharges from the local authority stormwater networks. This will be achieved through implementing two new targeted workstreams: Workstream 1 will deliver universal responses and water quality programmes and Workstream 2 will deliver SCaMPs and resulting capital improvements.. • The SCaMPs are designed to develop a programme of stormwater network improvement works to reduce the adverse effects of stormwater discharges for each sub-catchment over the term of the consent. <p>The SMS will prioritise the preparation and implementation of SCaMPs. Implementation of the SCaMPs will over the term of the consent assist in protecting indigenous biodiversity values, recreational, cultural, historical or landscape values of significance in the coastal environment. The implementation of the SCaMPs will also assist in maintaining and enhancing water quality in the coastal environment.</p> <p>In relation to natural character (Policies 35 and 36) it is considered that as the stormwater discharges are intermittent, temporary, and of short duration, and taking into account the state of the receiving environment during these events, any adverse effects will not prevent the natural</p>

Key Objectives / Policies	Relevance	Assessment
<p>plan, particular regard shall be given to preserving the natural character of the coastal environment by:</p> <ul style="list-style-type: none"> a) minimising any adverse effects from point source and non-point source discharges, so that aquatic ecosystem health is safeguarded; b) protecting the values associated with estuaries and bays, beaches and dune systems, including the unique physical processes that occur within and between them from inappropriate subdivision, use and development, so that healthy ecosystems are maintained; c) maintaining or enhancing amenity – such as, open space and scenic values – and opportunities for recreation and the enjoyment of the coast by the public; d) minimising any significant adverse effects from use and enjoyment of the coast by the public; e) safeguarding the life supporting capacity of coastal and marine ecosystems; f) maintaining or enhancing biodiversity and the functioning of ecosystems; and g) protecting scientific and geological features from inappropriate subdivision, use and development <p><u>Policy 36: Managing effect on natural character in the coastal environment – consideration</u></p> <p>When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect natural character in the coastal environment, and in determining whether an activity is inappropriate particular regard shall be given to:</p> <ul style="list-style-type: none"> a) the nature and intensity of the proposed activity including: <ul style="list-style-type: none"> i. the functional need or operational requirement to locate within the coastal environment ii. the opportunity to mitigate anticipated adverse effects of the activity b) the degree to which the natural character will be modified, damaged or destroyed including: 		<p>character of the receiving environments from being preserved. Further, where urban environments are located near to the coast there will generally be a functional need for stormwater discharges to be located within the coastal environment. This is because it will generally not be feasible to locate the discharge outside of the coastal environment, given distance topography, gradient etc.</p>

Key Objectives / Policies	Relevance	Assessment
<p>i. the duration and frequency of any effect, and/or</p> <p>ii. the magnitude or scale of any effect;</p> <p>iii. the irreversibility of adverse effects on natural character values;</p> <p>iv. whether the activity will lead to cumulative adverse effects on the natural character of the site/area.</p> <p>c) the resilience of the site or area to change;</p> <p>d) the opportunities to remedy or mitigate previous damage to the natural character;</p> <p>e) the existing land uses on the site.</p> <p><u>Policy 37: Safeguarding life-supporting capacity of coastal ecosystems – consideration</u></p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given to safeguarding the life-supporting capacity of coastal and marine ecosystems by maintaining or enhancing:</p> <p>a) any area within the intertidal or subtidal zone that contains unique, rare, distinctive or representative marine life or habitats;</p> <p>b) areas used by marine mammals as breeding, feeding or haul out sites;</p> <p>c) habitats in the coastal environment that are important during the vulnerable life stages of indigenous species;</p> <p>d) habitats, corridors and routes important for preserving the range, abundance, and diversity of indigenous and migratory species;</p> <p>e) any area that contain indigenous coastal ecosystems and habitats that are particularly vulnerable to modification – such as, estuaries, lagoons, coastal wetlands, dunelands, rocky reef systems and salt marshes; and</p> <p>f) the integrity, functioning and resilience of physical and ecological processes.</p>		<p>As discussed above, the implementation of the consent will in accordance with the proposed conditions, over the term of the consent, assist in to safeguarding the life-supporting capacity of coastal and marine ecosystems.</p> <p>Based on the above assessments, it is considered the proposal is generally consistent with the objectives and policies of the RPS relating to the coastal environment.</p>
<p>Energy, Infrastructure and Waste <u>Objective 10</u></p>	<p>This objective and policy refer to</p>	<p>The stormwater discharges are part of the operation of the local authority stormwater network, which is 'regionally</p>

Key Objectives / Policies	Relevance	Assessment
<p>The social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised and protected.</p> <p><u>Policy P39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration</u></p> <p>When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:</p> <p>(a) the social, economic, cultural and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure;</p>	<p>regionally significant infrastructure which is defined in the RPS as including the local authority stormwater networks and systems.</p>	<p>significant infrastructure’ and important to community health and wellbeing. A key purpose of local authority stormwater network is to collect, convey and discharge stormwater runoff from impervious surfaces efficiently to prevent ponding and flooding in sensitive areas and to create an integrated network to support the community's social, economic, cultural and environmental wellbeing. The benefits of this need to be taken into account in the consideration of these applications.</p>
<p>Freshwater</p> <p><u>Objective 12</u></p> <p>The quantity and quality of fresh water:</p> <p>(a) meet the range of uses and values for which water is required;</p> <p>(b) safeguard the life supporting capacity of water bodies; and</p> <p>(c) meet the reasonably foreseeable needs of future generations.</p> <p><u>Policy 40: Maintaining and enhancing aquatic ecosystem health in water bodies – consideration</u></p> <p>When considering an application for a resource consent particular regard shall be given to:</p> <p>(a) requiring that water quality, flows and water levels and aquatic habitats of surface water bodies are managed for the purpose of safeguarding aquatic ecosystem health;</p> <p>(c) managing water bodies and the water quality of coastal water for other purposes identified in regional plans.</p> <p><u>Objective 13</u></p> <p>The region’s rivers, lakes and wetlands support healthy functioning ecosystems.</p> <p><u>Policy 43: Protecting aquatic ecological function of water bodies – consideration</u></p>	<p>These objectives and policies relate to water quality of freshwater and healthy functioning ecosystems in rivers. Various stormwater discharge are located within freshwater and have the potential to effect water quality and ecosystem health. The Kakaho Stream, Horokiri Stream, Taupo Stream, Pauatahunui Stream, Duck Creek, Porirua Stream, Korokoro Stream, Karori</p>	<p>The local authority stormwater network discharges either directly or indirectly into a number of freshwater receiving environments. Given the nature of the discharges, and the various other sources of similar contaminants, it is very difficult to determine the contribution, if any, that a particular discharge makes to adverse effects on these freshwater receiving environments.</p> <p>It is noted however, that:</p> <ul style="list-style-type: none"> • The SMS describes how Wellington Water will minimise contamination from discharges from the local authority stormwater networks. This will be achieved through implementing two new targeted workstreams: Workstream 1 will deliver universal responses and water quality programmes and Workstream 2 will deliver SCaMPs and resulting capital improvements. • The SCaMPs are designed to develop a programme of stormwater network improvement works to reduce the adverse effects of stormwater discharges for each sub-catchment over the term of the consent. <p>Implementation of the SCaMPs over the term of the consent will assist in protecting the quality of freshwater and significant indigenous ecosystems and habitats and maintaining or enhancing the functioning of ecosystems and amenity and recreational values.</p>

Key Objectives / Policies	Relevance	Assessment
<p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given to:</p> <p>(a) maintaining or enhancing the functioning of ecosystems in the water body;</p> <p>(b) maintaining or enhancing the ecological functions of riparian margins;</p> <p>(c) minimising the effect of the proposal on groundwater recharge areas that are connected to surface water bodies;</p> <p>(d) maintaining or enhancing the amenity and recreational values of rivers and lakes, including those with significant values listed in Table 15 of Appendix 1;</p> <p>(e) protecting the significant indigenous ecosystems and habitats with significant indigenous biodiversity values of rivers and lakes, including those listed in Table 16 of Appendix 1;</p> <p>(f) maintaining natural flow regimes required to support aquatic ecosystem health;</p> <p>(g) maintaining fish passage;</p> <p>(h) protecting and reinstating riparian habitat, in particular riparian habitat that is important for fish spawning;</p>	<p>Stream, Owhiro Bay Stream, Kaiwharawhara Stream, Hutt River including Akatarawa River, Wainuiomata River, Speedy's Stream, Pakuratahi River, are listed in the RPS as rivers with significant indigenous ecosystems.</p>	<p>It is expected that the values of sub-catchments and the level of adverse effects from stormwater discharges on each sub-catchment will be taken into account in the prioritisation of SCaMPs.</p> <p>Based on the above assessments it is considered the proposal is generally consistent with the objectives and policies of the RPS relating to the freshwater.</p>
<p><u>Policy 64: Supporting a whole of catchment approach – non-regulatory</u></p> <p>Take a whole of catchment approach that recognises the inter-relationship between land and water, and support environmental enhancement initiatives to restore and enhance:</p> <p>(b) aquatic ecosystems and habitats; and</p> <p>(c) indigenous ecosystems and habitats.</p>	<p>Policy 64 promotes a whole of catchment approach which is what the proposal is seeking to achieve.</p>	<p>The application strongly aligns with Policy 64 as it seeks to set in place, though the SMS and the future SCaMPs a whole of catchment integrated approach to the management of stormwater network discharges in the identified catchments throughout Porirua, Wellington, Hutt City, and Upper Hutt.</p>
<p>Resource Management with Tangata Whenua</p> <p><u>Objective 25</u></p>	<p>The discharges have the potential to effect tangata whenua</p>	<p>Wellington Water is working to ensure that tangata whenua are active partners in resolving issues associated with stormwater discharges from the local authority stormwater network and that tangata whenua values are identified and</p>

Key Objectives / Policies	Relevance	Assessment
<p>The concept of kaitiakitanga is integrated into the sustainable management of the Wellington region’s natural and physical resources.</p> <p><u>Objective 26</u></p> <p>Mauri is sustained, particularly in relation to coastal and fresh waters.</p> <p><u>Objective 27</u></p> <p>Mahinga kai and natural resources used for customary purposes, are maintained and enhanced, and these resources are healthy and accessible to tangata whenua.</p> <p><u>Objective 28</u></p> <p>The cultural relationship of Māori with their ancestral lands, water, sites, wāhi tapu and other taonga is maintained.</p> <p><u>Policy 49: Recognising and providing for matters of significance to tangata whenua – consideration</u></p> <p>(a) the exercise of kaitiakitanga;</p> <p>(b) mauri, particularly in relation to fresh and coastal waters;</p> <p>(c) mahinga kai and areas of natural resources used for customary purposes; and</p> <p>(d) places, sites and areas with significant spiritual or cultural historic heritage value to tangata whenua.</p>	<p>values and interests.</p>	<p>provided for through the consent application and the implementation of the consent. By doing so, Wellington Water is seeking to ensure that the concept of kaitiakitanga and the cultural relationship of Māori to the environments impacted by the stormwater discharges are central to the implementation of the consent. It is seeking to achieve this through several mechanisms.</p> <p>In the first instance, a review of Te Mahere Wai o Te Kāhui Taiao and of the Ngāti Toa Rangatira statement on Te Awarua-o-Porirua Whaitua Implementation Programme has been undertaken as part of this application to identify potential effects on cultural values. This assessment identifies the fresh and coastal water values held by Ngāti Toa and Taranaki Whānui.</p> <p>Wellington Water is proposing that a full review of the Stormwater Monitoring Plan (SMP) will be undertaken in 2025 which will involve introducing a Mātauranga Māori element. This new element to the SMP will provide a detailed understanding of the values held by tangata whenua for freshwater and coastal water (expected to include mauri, mahinga kai and sites of significance), and how these values are impacted by the stormwater discharges. In addition, Wellington Water proposes to seek feedback from a Mātauranga Māori expert, or other party agreed to by Te Rūnanga o Toa Rangatira and Taranaki Whānui, as part of its updates of the SMS, and preparation of each SCaMP to ensure that the impacts on tangata whenua values are progressively reduced through this consent.</p> <p>The Collaborative Committee is central to Wellington Water’s proposal. This Committee will comprise an equal number of members from tangata whenua and the consent holder.</p> <p>The overall purpose of the Collaborative Committee is to provide strategic direction to the consent holder to reduce the adverse effects of stormwater discharges over the term of the consent. To help achieve this purpose the functions of</p>

Key Objectives / Policies	Relevance	Assessment
		<p>the Collaborative Committee in relation to stormwater discharges will include:</p> <ul style="list-style-type: none"> • Overseeing updates to and implementation of the Stormwater Management Strategy • Overseeing the preparation and implementation of the Sub-catchment Management Plans • Overseeing the preparation of the Mātauranga Māori Monitoring Plan • Reviewing the Annual Report • Overseeing the preparation, updating, and implementation of the community engagement plan. <p>The Collaborative Committee structure has been designed to recognise the role of tangata whenua as kaitiaki.</p> <p>Based on the above assessment it is anticipated that the Collaborative Committee, SMS and SCaMPs will assist in meeting these RPS provisions. It is acknowledged however that this needs to be determined by Mana Whenua.</p>
<p>Indigenous ecosystems</p> <p><u>Objective 16</u></p> <p>Indigenous ecosystems and habitats with significant biodiversity values are maintained and restored to a healthy functioning state.</p> <p><u>Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values – consideration</u></p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect indigenous ecosystems and habitats with significant indigenous biodiversity values, and in determining whether the proposed activity is inappropriate particular regard shall be given to:</p> <p>(a) maintaining connections within, or corridors between, habitats of indigenous flora and fauna, and/or enhancing the connectivity between fragmented indigenous habitats;</p>		<p>The Part 2 Report: Assessment of Environmental Effects identifies that stormwater discharges from the local authority stormwater network do impact on ecosystems and habitats with significant biodiversity values. In general terms the application will address the potential adverse effects on these values through the universal measures and work streams in the SMS and through sub-catchment based capital delivery, i.e. the SCaMPs.</p> <p>The development and implementation of SCaMPs will be prioritised through the SMS. It is expected that the prioritisation of SCaMPs will take into account, among other things, the presence of significant indigenous biodiversity values and the degree of adverse effects that stormwater discharges are having on such values.</p> <p>As the SMS and SCaMPs focus only on the adverse effects of stormwater discharges from the local authority stormwater network they will not on their own restore all waterbodies to</p>

Key Objectives / Policies	Relevance	Assessment
<p>(b) providing adequate buffering around areas of significant indigenous ecosystems and habitats from other land uses;</p> <p>(c) managing wetlands for the purpose of aquatic ecosystem health;</p> <p>(d) avoiding the cumulative adverse effects of the incremental loss of indigenous ecosystems and habitats;</p> <p>(e) providing seasonal or core habitat for indigenous species;</p> <p>(f) protecting the life supporting capacity of indigenous ecosystems and habitats;</p> <p>(g) remedying or mitigating adverse effects on the indigenous biodiversity values where avoiding adverse effects is not practicably achievable; and</p> <p>(h) the need for a precautionary approach when assessing the potential for adverse effects on indigenous ecosystems and habitats.</p>		<p>healthy functioning state (where this does not currently exist). However, it is considered that they will contribute towards Objective 16 and are considered an appropriate response within the framework set by Policy 47.</p> <p>Of particular relevance to this conclusion with regard to Policy 47 it is noted that:</p> <ul style="list-style-type: none"> • The effects on wetlands arising from stormwater discharges • Opportunities to avoid incremental loss of indigenous ecosystems and habitats • Protecting life supporting capacity • Remedying and mitigating adverse effects on indigenous biodiversity values • The application of a precautionary approach will be generally addressed by the measures in the SMS, e.g. the universal requirement for developer-led SCaMPs and the high risk site audits, and can be expected to be specifically addressed at the sub-catchment level through SCaMPs.

Table 4: Proposed Change 1 to the Regional Policy Statement for the Wellington Region¹

Key Objectives / Policies	Relevance	Assessment
<p>Overarching objective Objective A <u>Integrated management of the region’s natural and built environments is guided by Te Ao Māori and:</u></p> <p>(a) <u>incorporates mātauranga Māori; and</u> (b) <u>recognises ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and</u> (c) <u>protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and</u> (d) <u>recognises the dependence of humans on a healthy natural environment; and</u> (e) <u>recognises the role of both natural and physical resources in providing for the characteristics and qualities of well-functioning urban environments; and</u> (f) <u>responds effectively to the current and future pressures of climate change, population growth and development.</u></p> <p>Policy IM.1: Integrated management – ki uta ki tai - consideration <u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan particular regard shall be given to:</u></p> <p>(a) <u>partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua involvement in resource management and decision making; and</u> (b) <u>recognising the interconnectedness between air, freshwater, land, coastal marine areas, ecosystems and all living things – ki uta ki tai; and</u></p>	<p>This new objective and policy introduced by Plan Change 1 set an overarching direction for all resource management decisions in the region, and place particular emphasis on the need to partner with mana whenua and take a holistic and integrated approach in resource management.</p>	<p>The global approach of this application seeks to ensure that the effects of stormwater discharges within the 35 sub-catchments in Porirua, Wellington, Hutt City, and Upper Hutt are managed in a holistic and integrated manner. The proposed approach to implementing the SMS and developing and implementing SCA MPs through the Collaborative Committee provides the opportunity for Te Ao Māori to guide decision making, for Mātauranga Māori to be incorporated into this integrated approach. The SMS and SCA MPs will also recognise the role of the natural environment in a well-functioning urban environment and seek to reduce the adverse effects of stormwater discharges on the natural environment.</p>

¹ In column 1, ‘Key Objectives/Policies’, where the content of a provision is underlined this indicates text added by Plan Change 1. Where the content of a provision is ~~struck through~~ this indicates text deleted by Plan Change 1.

Key Objectives / Policies	Relevance	Assessment
<p>(c) <u>recognising the interrelationship between natural resources and the built environments; and</u></p> <p>(d) <u>making decisions based on the best available information, improvements in technology and science, and mātauranga Māori; and</u></p> <p>(e) <u>upholding Māori data sovereignty; and</u></p> <p>(f) <u>requiring Māori data and mātauranga Māori to be interpreted within Te Ao Māori; and</u></p> <p>(g) <u>recognising that the impacts of activities may extend beyond immediate and directly adjacent area, and beyond organisational or administrative boundaries</u></p>		
<p>Climate Change</p> <p><u>Objective CC.1</u></p> <p><u>By 2050, the Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of:</u></p> <p>(a) <u>sustainable air, land, freshwater, and coastal management,</u></p> <p>(b) <u>well-functioning urban environments and rural areas, and</u></p> <p>(c) <u>well-planned infrastructure.</u></p> <p><u>Objective CC.6</u></p> <p><u>Resource management and adaptation planning increase the resilience of communities and the natural environment to the short, medium, and long-term effects of climate change.</u></p> <p><u>Policy CC.14</u></p> <p><u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, provide for actions and initiatives, particularly the use of nature-based solutions, that contribute to climate-resilient urban areas, including:</u></p>	<p>The new climate change provisions introduced by Plan Change 1 address the effects of human activities on climate change as well as the effects of climate change on human activities. It is these latter provisions which are of particular relevance to this application.</p>	<p>The SMS requires that all new development will need to design for hydraulic neutrality which includes the predicted impacts of climate change. In addition, the potential effects of climate change will be taken into account when each SCaMP is prepared, e.g. the sizing and design of stormwater treatment devices proposed in a sub-catchment will ensure that they are resilient to changes anticipated from climate change. It is therefore considered that the proposal is consistent with the climate change provisions of Plan Change 1.</p>

Key Objectives / Policies	Relevance	Assessment
<p>(a) _____ ...</p> <p>(f) _____ buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.</p>		
<p>Freshwater</p> <p>Objective 12</p> <p><u>Natural and physical resources of the region are managed in a way that prioritises:</u></p> <p>(a) <u>first, the health and well-being of water bodies and freshwater ecosystems</u></p> <p>(b) <u>second, the health needs of people (such as drinking water)</u></p> <p>(c) <u>third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future; and</u></p> <p><u>Te Mana o te Wai encompasses six principles relating to the roles of tangata whenua and other New Zealanders in the management of freshwater, and these principles inform this RPS and its implementation.</u></p> <p><u>The six principles are:</u></p> <p>(a) <u>Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater</u></p> <p>(b) <u>Kaitiakitanga: the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations</u></p> <p>(c) <u>Manaakitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others</u></p> <p>(d) <u>Governance: the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future</u></p>	<p>Plan Change 1 deletes existing Objective 12 and replaces this with a new objective that carries forward the Te Mana o Te Wai objective and principles from the NPSFM. Plan Change 1 also incorporates Te Mana o te Wai expressions from Rangitāne o Wairarapa and Kahungunu ki Wairarapa. It has been assumed that these expressions do not relate to this application as it does not cover stormwater</p>	<p>The local authority stormwater network discharges either directly or indirectly into a number of freshwater receiving environments. Given the nature of the discharges, and the various other sources of similar contaminants, it is difficult to determine the contribution that a particular discharge makes to adverse effects on these freshwater receiving environments. It is noted however, that:</p> <ul style="list-style-type: none"> • The SMS describes how Wellington Water will minimise contamination from discharges from the local authority stormwater networks. This will be achieved through implementing two new targeted workstreams: Workstream 1 will deliver universal responses and water quality programmes and Workstream 2 will deliver SCaMPs and resulting capital improvements. • The SCaMPs are designed to develop a programme of stormwater network improvement works to reduce the adverse effects of stormwater discharges for each sub-catchment over the term of the consent. • Implementation of the SCaMPs over the term of the consent will assist in protecting the quality of freshwater and significant indigenous ecosystems and habitats and maintaining or enhancing the functioning of ecosystems and amenity and recreational values. • It is expected that the prioritisation of SCaMPs will take into account, among other things, the presence of significant indigenous biodiversity values and the degree of adverse effects that stormwater discharges are having on such values.. <p>In addition, the Collaborative Committee will be a partnership between the consent holder and Mana Whenua and has been</p>

Key Objectives / Policies	Relevance	Assessment
<p>(e) <u>Stewardship: the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations, and</u></p> <p>(f) <u>Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation.</u></p> <p><u>And the Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa</u></p> <p><u>The quantity and quality of fresh water:</u></p> <p>(a) <u>meet the range of uses and values for which water is required;</u></p> <p>(b) <u>safeguard the life supporting capacity of water bodies; and</u></p> <p>(c) <u>meet the reasonably foreseeable needs of future generations.</u></p> <p><u>Policy 40: Maintaining Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems aquatic ecosystem health in water bodies – consideration</u></p> <p>When considering an application for a <u>regional</u> resource consent, particular regard shall be given to:</p> <p>(a) <u>requiring that water quality, flows and water levels and aquatic habitats of surface water bodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and well-being of waterbodies and the health and wellbeing of freshwater ecosystems for the purpose of safeguarding aquatic ecosystem health;</u></p> <p>(b) <u>that, requiring as a minimum, water quality in the coastal marine area is to be managed in a way that protects and enhances the health and well-being of waterbodies and the health and wellbeing of marine ecosystems; for the purpose of maintaining or enhancing aquatic ecosystem health; and</u></p> <p>(c) <u>managing water bodies and the water quality of coastal water for other purposes identified in regional plans.</u></p> <p>(c) <u>providing for mana whenua / tangata whenua values, including mahinga kai;</u></p> <p>(d) <u>maintaining or enhancing the functioning of ecosystems in the water body;</u></p>	<p>networks in the Wairarapa.</p> <p>Plan change 1 amends Policy 40 to integrate Te Mana o Te Wai, and to add in clauses from Policy 43 of the Operative RPS. Plan Change 1 proposes that Policy 43 is deleted.</p>	<p>designed to enable the Te Mana o te Wai principles relating to mana whakahaere, kaitiakitanga and manaakitanga to inform the future management of the stormwater discharges.</p> <p>Based on the above assessments it is considered the proposal is generally consistent with the objectives and policies of the RPS relating to the freshwater.</p>

Key Objectives / Policies	Relevance	Assessment
<p>(e) <u>maintaining or enhancing the ecological functions of riparian margins;</u></p> <p>(f) <u>minimising the effect of the proposal on groundwater recharge areas that are connected to surface water bodies;</u></p> <p>(g) <u>maintaining or enhancing the amenity and recreational values of rivers and lakes, including those with significant values listed in Table 15 of Appendix 1;</u></p> <p>(h) <u>protecting the significant indigenous ecosystems and habitats with significant indigenous biodiversity values of rivers and lakes, including those listed in Table 16 of Appendix 1;</u></p> <p>(i) <u>maintaining natural flow regimes required to support aquatic ecosystem health;</u></p> <p>(j) <u>maintaining or enhancing space for rivers to undertake their natural processes;</u></p> <p>(k) <u>maintaining fish passage;</u></p> <p>(l) <u>protecting and reinstating riparian habitat, in particular riparian habitat that is important for fish spawning;</u></p> <p>(m) <u>restricting stock access to estuaries rivers, lakes and wetlands; and</u></p> <p>(n) <u>avoiding the removal or destruction of indigenous wetland plants in wetlands.</u></p>		
<p>Indigenous Ecosystems</p> <p>Objective 16</p> <p>Indigenous ecosystems and habitats with significant <u>ecosystem functions and services and/or biodiversity values are maintained protected, enhanced, and restored to a healthy functioning state.</u></p> <p>Objective 16A</p> <p><u>The region’s indigenous ecosystems are maintained, enhanced, and restored to a healthy functioning state, improving their resilience to</u></p>	<p>Plan Change 1 proposes changes to existing RPS objectives and policies relating to indigenous ecosystems. It also introduces new objectives and policies which provide</p>	<p>The Part 2 Report: Assessment of Environmental Effects identifies that stormwater discharges from the local authority stormwater network do impact on ecosystems and habitats with significant biodiversity values. In general terms the application will address the potential adverse effects on these values through the universal measures and works streams in the SMS and through sub-catchment based capital delivery, i.e. the SCaMPs.</p> <p>The development and implementation of SCaMPs will be prioritised through the SMS. It is expected that the prioritisation of SCaMPs will take into account, among other things, the presence of significant indigenous biodiversity values and the</p>

Key Objectives / Policies	Relevance	Assessment
<p><u>increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke².</u></p> <p>Objective 16B <u>Mana whenua / tangata whenua values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous ecosystem health and well-being, are given effect to in decision-making, and mana whenua / tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity.</u></p> <p>Policy 47 When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect indigenous ecosystems and habitats with significant indigenous biodiversity values, and in determining whether the proposed activity is inappropriate particular regard shall be given to:</p> <p>(a) maintaining connections within, or corridors between, habitats of indigenous flora and fauna and/or enhancing the connectivity between fragmented indigenous habitats;</p>	<p>direction with regard to:</p> <ul style="list-style-type: none"> all indigenous ecosystems (rather than being limited to those indigenous ecosystems with significance values) mana whenua / tangata whenua values relating to indigenous biodiversity landowner and 	<p>degree of adverse effects that stormwater discharges are having on such values.</p> <p>As the SMS and SCaMPs focus only on the adverse effects of stormwater discharges from the local authority stormwater network, they will not on their own restore the waterbodies to healthy functioning state (where this does not currently exist). However, it is considered that they will contribute towards Objective 16, 16A and are considered an appropriate response within the frame set by Policy 47. It is considered that the application is consistent with Objective 16B based on the proposed Collaborative Committee, Kaitiaki Monitoring and given that Wellington Water will seek input from a from a Mātauranga Māori expert, or other party agreed to by Te Rūnanga o Toa Rangatira and Taranaki Whānui, as part of its updates of the SMS, and preparation of each SCaMP to ensure that the impacts on tangata whenua values are progressively reduced through this consent</p> <p>With regard to Policy 47 it is noted that:</p> <ul style="list-style-type: none"> The effects on wetlands arising from stormwater discharges Opportunities to avoid incremental loss of indigenous ecosystems and habitats Protecting life supporting capacity

² Te Rito o te Harakeke is a concept that refers to the need to maintain the integrity of indigenous biodiversity. It recognises the intrinsic value and mauri of indigenous biodiversity as well as people’s connections and relationships with it. It recognises that our health and wellbeing are dependent on the health and wellbeing of indigenous biodiversity and that in return we have a responsibility to care for it. It acknowledges the web of interconnectedness between indigenous species, ecosystems, the wider environment, and the community. Te Rito o te Harakeke comprises six essential elements to guide tangata whenua and local authorities in managing indigenous biodiversity and developing objectives, policies, and methods for giving effect to Te Rito o te Harakeke:

- the intrinsic value and mauri of indigenous biodiversity;
- the bond between people and indigenous biodiversity through whakapapa (familial) relationships and mutual interdependence;
- the responsibility of care that tangata whenua have as kaitiaki, and that other New Zealanders have as stewards, of indigenous biodiversity;
- the connectivity between indigenous biodiversity and the wider environment;
- the incorporation of te ao Māori and mātauranga Māori;
- the requirement to partner with tangata whenua.

Key Objectives / Policies	Relevance	Assessment
<p>(b) providing adequate buffering around areas of significant indigenous ecosystems and habitats from other land uses;</p> <p>(c) managing wetlands for the purpose of aquatic ecosystem health, <u>recognising the wider benefits, such as for indigenous biodiversity, water quality and holding water in the landscape;</u></p> <p>(d) avoiding the cumulative adverse effects of the incremental loss of indigenous ecosystems and habitats;</p> <p>(e) providing seasonal or core habitat for indigenous species;</p> <p>(f) protecting the life supporting capacity of indigenous ecosystems and habitats;</p> <p>(g) remediating or mitigating <u>minimising or remediating</u> adverse effects on the indigenous biodiversity values where avoiding adverse effects is not practicably achievable; and</p> <p>(h) the need for a precautionary approach when assessing the potential for adverse effects on indigenous ecosystems and habitats;</p> <p>(i) <u>the limits to, and expected outcomes from biodiversity offsetting and biodiversity compensation set out in Policy 24.</u></p> <p><u>Policy IE.2: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - consideration</u></p> <p><u>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, particular regard shall be given to enabling mana whenua / tangata whenua to exercise their role as kaitiaki, including, but not restricted to:</u></p> <p>(a) <u>providing for mana whenua / tangata whenua values associated with indigenous biodiversity, including giving local effect to Te Rito o te Harakeke,</u></p> <p>(b) <u>incorporating the use of mātauranga Māori in the management and monitoring of indigenous biodiversity; and</u></p>	<p>community values relating to indigenous biodiversity.</p>	<ul style="list-style-type: none"> • Remediating and mitigating adverse effects on indigenous biodiversity values • The application of a precautionary approach will be generally addressed by the measures in the SMS, e.g. the universal requirement for developer-led SCAmps and the high risk site audits and can be expected to be specifically addressed at the sub-catchment level through SCAmps. It is therefore considered that the proposal is consistent with Policy 47 and is not 'inappropriate'.

Key Objectives / Policies	Relevance	Assessment
<p>(c) <u>supporting mana whenua / tangata whenua to access and exercise sustainable customary use of indigenous biodiversity, including for mahinga kai and taonga, in accordance with tikanga.</u></p>		
<p><u>Policy UD.2: Enable Māori cultural and traditional norms – consideration</u> <u>When considering an application for a resource consent, notice of requirement, or a plan change of a district plan for use or development, particular regard shall be given the ability to enable Māori to express their culture and traditions in land use and development, by as a minimum providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</u></p>		<p>Wellington Water is working to ensure that Mana Whenua are active partners in resolving issues associated with stormwater discharges from the local authority stormwater network and that their values are identified and provided for through the consent application and the implementation of the consent. By doing so, Wellington Water is seeking to ensure that the cultural relationship of tangata whenua to the environments impacted by the stormwater discharges is central to the implementation of the consent. It is seeking to achieve this through several mechanisms.</p> <p>The primary measure to achieve this is through the Collaborative Committee. This Committee will comprise an equal number of members from tangata whenua and the consent holder. The overall purpose of the Collaborative Committee is to provide strategic direction to the consent holder to reduce the adverse effects of stormwater discharges over the term of the consent. To help achieve this purpose, the functions of the Collaborative Committee will include:</p> <ul style="list-style-type: none"> • Overseeing updates to and implementation of the Stormwater Management Strategy • Overseeing the preparation and implementation of the Sub-catchment Management Plans • Overseeing the preparation of the Mātauranga Māori Monitoring Plan • Reviewing the Annual Report • Overseeing the preparation, updating, and implementation of the community engagement plan. <p>In addition, Wellington Water is proposing the development of kaitiaki monitoring element of the SMP and will seek input from from a Mātauranga Māori expert, or other party agreed to by Te</p>

Key Objectives / Policies	Relevance	Assessment
		Rūnanga o Toa Rangatira and Taranaki Whānui, as part of its updates of the SMS, and preparation of each SCaMP. Based on these measures, it is considered that proposal is consistent with Policy UD.2.

Table 5: Proposed Natural Resources Plan (Final Appeals Version 2022)

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>Stormwater discharges</p> <p><u>Objective O38</u> The adverse quality and quantity effects of stormwater discharges from stormwater networks and urban land uses are <u>reduced</u> over time.</p> <p><u>Policy P83: Minimising adverse effects of stormwater discharges</u> The adverse effects of stormwater discharges shall be minimised including by: (a) using good management practice, and (b) taking a source control and treatment train approach to new activities and land uses, and (c) implementing water sensitive urban design in new subdivision and development, and (d) progressively improving existing stormwater, wastewater, road and other public infrastructure, including during routine maintenance and upgrade., and (e) managing localised adverse effects, including by addressing particular attributes appropriate to the receiving environment.</p> <p><u>Policy P84: Managing land use impacts on stormwater</u> Land use, subdivision and development, including stormwater discharges, shall be managed so that runoff volumes and peak flows: (a) avoid or minimise scour and erosion of stream beds, banks and coastal margins, and (b) do not increase risk to human health or safety, or increase the risk of inundation, erosion or damage to property or infrastructure, including by retaining, as far</p>	<p>These objectives and policies specifically relate to stormwater discharges to fresh and coastal waters. Given the specificity of these objectives and policies significant weight should be given to them in assessing the Global Stormwater Consent application.</p>	<p>The application is consistent with Objective O38 and Policies P83, P84, P86, P87 and P88 in that:</p> <ul style="list-style-type: none"> • The SMS sets out management options to minimise contaminant inputs into the stormwater network from land use activities at high risk of generating stormwater contaminants (in accordance with Policy P83). • The SCaMPs will set out how stormwater discharges will be specifically managed in sub-catchments across the cities taking a source control and treatment train approach. • Where a Wellington Water led SCaMP does not yet exist new development above 3,000 m² will be required to prepare a development led SCaMP • The SMS contains a number of measures that will manage the stormwater discharges so scour and erosion will be minimised and reduce the risk to human health and safety (as set out in Policy P84). Scour and erosion will also be addressed more specifically at the sub-catchment level through SCaMPs • Through the SMS and proposed SCaMPs, the consent holder will reduce the adverse effects of stormwater discharges progressively over the term of the consent, using workstreams 1 and 2, including the prioritisation of SCaMPS as outlined in the SMS (in accordance with Policy P86). <p>There are limited sources of wastewater contamination covered within this consent (there are other consents that will address this). The implementation of the SMS and SCaMPs will reduce the adverse effects on water quality from the stormwater discharges across the extent of the global consent and in each sub-catchment. As part of the SMS, Wellington Water will implement workstreams to respond to acute human health risks resulting</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>as practicable, pre-development hydrological conditions in new subdivision and development.</p> <p><u>Policy P86: Second-stage local authority and state highway network consents</u></p> <p>When an application for resource consent is made with a stormwater management strategy, the adverse effects of discharges from a local authority and state highway stormwater networks shall be minimised by:</p> <p>(a) identifying in the stormwater management strategy priorities for progressive improvement, and timeframes to achieve this improvement, in accordance with any relevant objectives identified in the Plan, and</p> <p>(b) where appropriate, developing catchment-specific stormwater management plans or other methods to identify and prioritise actions in accordance with any relevant objectives identified in the Plan, and</p> <p>(c) progressively implementing the stormwater management strategy and any actions identified under (b), and (d) for new stormwater networks, managing the adverse quality and quantity effects of post-development stormwater discharges in accordance with good management practice and Policies P83 and P84, and</p> <p>(e) progressively reducing the impact of untreated wastewater on fresh and coastal water in accordance with Policies P87 and P88, and</p> <p>(f) progressively improving existing stormwater, wastewater, road and other public infrastructure, including through routine maintenance and upgrade.</p> <p><u>Policy P87: Minimising wastewater and stormwater interactions</u></p>		<p>from stormwater discharges, similar to requirements in the Stage 1 consent. Wellington Water is continuing to develop these workstreams based on lessons learnt during the implementation of the stage 1 consent. More information will be provided prior to the hearing.</p> <p>Based on these measures it is considered that the application is consistent with these stormwater provisions.</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>The adverse effects of wastewater and stormwater interactions on fresh and coastal water shall be minimised by:</p> <ul style="list-style-type: none"> (a) avoiding wastewater contamination of stormwater from new wastewater networks or connections authorised after the date of 31 July 2015, and (b) progressive elimination removal of existing wastewater contamination of stormwater progressively, and as soon as reasonably practicable from the existing wastewater network, and (c) progressively reducing stormwater and groundwater infiltration and inflow into the wastewater network. <p><u>Policy P88: Assessing resource consents to discharge stormwater containing wastewater</u></p> <p>A resource consent application under Rule R53 to discharge stormwater from a local authority stormwater network known to contain wastewater is inappropriate unless the application includes:</p> <ul style="list-style-type: none"> (a) a plan of how Policy P87 will be achieved, including key milestones and dates, and (b) the results of consultation with mana whenua on their values and interests in relation to discharges and receiving waters. 		
<p><u>Objective O3</u></p> <p>Air, land, freshwater bodies and the coastal marine area are managed as integrated and connected resources; ki uta ki tai – mountains to the sea.</p>	<p>This objective promotes integrated management which is what the proposal is seeking to achieve over the longer term.</p>	<p>The application strongly aligns with Objective O3 as it seeks to set in place, though the SMS and the future SCAmps a whole of catchment integrated approach to the management of stormwater network discharges in the identified catchments throughout Porirua, Wellington, Hutt City, and Upper Hutt.</p>
<p>Discharges</p> <p><u>Policy P66: Minimising effects of discharges to water or land</u></p>	<p>These objectives and policies apply to all types of discharges which include stormwater discharges.</p>	<p>P66 seeks to minimise the discharge of contaminants through a ‘hierarchy’ of avoiding the production of the contaminant, reducing the amount of the contaminant, minimising the volume or amount of the discharge and promoting the discharge to land.</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>Discharges of contaminants to water or land will be minimised through the following hierarchy:</p> <ul style="list-style-type: none"> a) avoiding the production of the contaminant b) reducing the amount of contaminants, including by reusing, recovering or recycling contaminants c) minimising the volume or amount of the discharge d) discharging to land is promoted over discharging direct to water, including using land-based treatment, constructed wetlands or other systems to treat contaminants prior to discharge. <p><u>Policy P67: Human drinking water supplies</u></p> <p>The adverse effects from discharges to land and water on the quality of community drinking water supplies and group drinking water supplies shall be avoided to the extent necessary to implement <u>regulations for human drinking water, the National Environmental Standards for Sources of Human Drinking Water 2007, in consultation with the drinking water supply operator will be consulted with as appropriate, taking into consideration emerging contaminants and industry best practice.</u></p>		<p>The local authority stormwater network is an existing network which has been designed to collect, convey and discharge stormwater runoff, which can be contaminated, from impervious surfaces to prevent ponding and flooding in sensitive areas. Consequently, discharges from it cannot be avoided. However, in other respects Wellington Water’s management of the network discharges is consistent with this policy.</p> <p>The SMS sets out measures to reduce and minimise contaminant inputs into the stormwater network. These include the auditing of high risk sites, universal measures and an Education and Outreach programme. In addition to these measures, there are a number of treatment options outlined in the SMS that include discharging to land. The SCaMPs will set out how these treatment options will be used in each sub-catchment.</p> <p>In terms of Policy P67, all local authority stormwater discharges are down stream of the surface water abstraction points identified in Schedule M1. However, groundwater supply wells and protection area (identified in Schedule M2) is located in Lower Hutt which is within the Lower Hutt South and Waiwhetu sub-catchments. The Wellington Urban Source Water Risk Management Plan identifies stormwater as one risk to the ground water supplies in Lower Hutt. In addition to the mitigation measures set out in that Plan (e.g. modelling connectivity between urban streams impacted by stormwater and aquifer) both the SMS and SCaMPs will provide further mitigation.</p> <p>Under the SMS actions such as the proposed Education and Outreach programme and the High-risk site audits will assist to mitigate the risk of residents and business allowing chemicals to enter the stormwater network. Through the SCaMP process mitigation measures will be implemented in each sub-catchment which will further reduce the adverse effects from the stormwater discharges. These measures may include infiltration trenches and site wide infiltration, sand filters, and riparian buffers which will contribute to treating the stormwater runoff</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p><u>Policy P68: Discharges to land</u></p> <p>The discharge of contaminants to land shall be managed to:</p> <ul style="list-style-type: none"> (a) minimise adverse effects on the life-supporting capacity of soil, (b) avoid creating contaminated land, (c) not exceed the capacity of the soil to treat, use or remove the contaminant, (d) not exceed the available capacity of the soil to absorb the discharge (e) avoid significant adverse effects on public health and amenity, and (f) not result in a discharge to water that causes more than a minor adverse effects, and (g) avoid, remedy or mitigate adverse effects on mana whenua values when considering applications for 		<p>before it potentially enters groundwater. The SCaMPs will be prepared in a prioritised order. The framework for this prioritisation is yet to be confirmed, however it is expected that potential risks to drinking water supply will be one factor that will be taken into account.</p> <p>It is considered that these measures will adequately mitigate the risks to water supply that are associated with the discharge of stormwater from the local authority stormwater network.</p> <p>In terms of policy P68, there are existing discharges to land and to land that may enter water. It is considered a low risk that these discharges will create contaminated land and through the high risk site audits proposed in the SMS, the risk will be further reduced. With respect to clauses (c) and (d), it is noted that in those cases where the discharge to land is not intended to enter surface water, there will be a limit to the soakage capacity, but this is likely only to be exceed in significant rainfall events. Clause (e) requires that significant adverse effects on public health and amenity are avoided. The Part 2 Report: AEE does not identify any sub-catchments that result in significant adverse effects on public health. With respect to clause (f) the Part 2 Report: AEE identifies that there are more than minor adverse effects on water bodies in 12 of the 35 sub-catchments. These adverse effects will be mitigated through the measures in the SMS and SCaMPs, and it is expected that the values of sub-catchments and the level of adverse effects from stormwater discharges on each sub-catchment will be taken into account in the prioritisation of SCaMPs. With respect to clause (g) it is noted that the application proposes various mechanisms to ensure that adverse effects on Mana Whenua values are integral to the mitigation measures under the consent. These include the Collaborative Committee, Kaitiaki monitoring and input from a Mātauranga Māori expert, or other party agreed to by Te Rūnanga o Toa Rangatira and</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>discharges to land which may adversely affect statutory acknowledgement areas, sites of significance, or Heritage New Zealand Pouhere Taonga sites, identified in this Plan, any relevant district plan, or in a planning document recognised by an iwi authority and lodged with a local authority.</p> <p><u>Policy P69: Promoting discharges to land</u></p> <p>The discharge of contaminants to land is promoted over direct discharges to water, particularly where there are adverse effects on:</p> <p>a) aquatic ecosystem health and mahinga kai, or b) contact recreation and Māori customary use.</p>		<p>Taranaki Whānui, as part of the updates of the SMS, and preparation of each SCaMP</p> <p>The SMS sets out a number of potential management options which promote discharges to land (required by Policy P69) such as vegetated swales, filter trips, pervious pavement, infiltration trenches, bioretention measures, sand filters, and more. These measures, along with a range of other measures, will where appropriate, implemented through the SCaMPs.</p> <p>For the reasons set out in the above assessment it is considered that the proposal is consistent with the objectives and policies relating to discharges.</p>
<p>Beneficial use and development</p> <p><u>Objective O9</u></p> <p>The social, economic, cultural and environmental benefits of regionally significant infrastructure, renewable energy generation activities and the utilisation of mineral resources are recognised.</p> <p><u>Policy P6: Uses of land and water</u></p> <p>The cultural, social and economic benefits of using land and water for:</p> <p>(a) treatment, dilution and disposal of wastewater and stormwater, shall be recognised</p> <p><u>Policy P11: Benefits of regionally significant infrastructure and renewable electricity generation facilities</u></p> <p>When considering proposals that relate to the provision of regionally significant infrastructure, or renewable energy generation activities, particular regard will be given to the benefits of those activities.</p>	<p>Regionally Significant Infrastructure is a defined term in the pNRP and includes the local authority stormwater networks and systems, including discharges.</p>	<p>The local authority stormwater network discharges are part of the operation of the stormwater network, which is ‘regionally significant infrastructure’ and important to community health and wellbeing.</p> <p>A key purpose of the local authority stormwater network is to collect, convey and discharge stormwater runoff from impervious surfaces efficiently to prevent ponding and flooding in sensitive areas and to create an integrated network to support the community's wellbeing. These benefits should be taken into account in considering this application.</p> <p>In general terms stormwater discharges need to occur relatively close to the urban environments where the stormwater run-off originated. Therefore, where urban environments are located near to the coast or a valued freshwater environment there will generally be a functional need for stormwater discharges to be located within the coastal environment or the freshwater body. This is because it will generally not be feasible to locate the</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p><u>Policy P13: Providing for Regionally Significant Infrastructure and renewable electricity generation activities</u></p> <p>The use, development, operation, maintenance, and upgrade of Regionally Significant Infrastructure and renewable energy generation activities are provided for, in appropriate places and ways. This includes by having particular regard to:</p> <p>(a) the strategic integration of infrastructure and land use, and</p> <p>(b) the location of existing infrastructure and structures, and</p> <p>(d) the functional need and operational requirements associated with developing, operating, maintaining and upgrading Regionally Significant Infrastructure and renewable energy generation activities.</p>		<p>discharge somewhere else, given distance topography, gradient etc.</p> <p>Policy 6 recognises that there are benefits in using land and water for the dilution and treatment of stormwater.</p> <p>The beneficial use and development objectives and policies support the provision of Regionally Significant Infrastructure including the local authority stormwater networks and the discharges from these networks. Consequently, it is considered that the proposal is consistent with these objectives and policies.</p>
<p>Recreation values</p> <p><u>Objective O7</u></p> <p>The recreational values of the coastal marine area, rivers and lakes and their margins and natural wetlands are maintained and where appropriate for recreational purposes, is enhanced.</p> <p><u>Policy P9: Contact recreation and Māori customary use</u></p> <p>Use and development shall avoid, remedy or mitigate any adverse effects on contact recreation and Māori customary use in fresh and coastal water, including by:</p> <p>(a) providing water quality and, in rivers, flows suitable for contact recreation and Māori customary use, and</p> <p>(b) managing activities to maintain or enhance contact recreation values in the beds of lakes and rivers, including</p>	<p>The Hutt and Wainuiomata Rivers are listed in Schedule H1: Regionally significant primary contact recreation water bodies.</p> <p>The following areas have been identified in Schedule H2 Priorities for improvement of fresh and coastal water quality for contact recreation and Māori customary use:</p> <ul style="list-style-type: none"> • The Hutt River 	<p>The Part 2 Report: AEE covers swimming, surfing, boating, fishing, and food gathering under the recreation/ public health effects. For most sub-catchments the recreational/ public health effects are concluded in the AEE as being low, with the exception of Island/Houghton which is assessed as having moderate adverse recreation and public health effects from stormwater discharges.</p> <p>O7 and P9(b) seek the maintenance of recreation values and where appropriate their enhancement. The implementation of the SMS and SCaMPs will over the term of the consent achieve the maintenance and the enhancement of recreational values where these effects are attributed to the stormwater discharges. However, this will occur in some sub-catchments ahead of others. The SMS will set out the prioritisation of sub-catchments. It is expected that the values of sub-catchments and the level of adverse effects from stormwater discharges on each sub-</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>by retaining existing swimming holes and maintaining access to existing contact recreation locations, and</p> <p>(c) encouraging improved access to suitable swimming and surfing locations, and</p> <p>(d) providing for the passive recreation and amenity values of freshwater bodies and the coastal marine area.</p> <p><u>Policy P140: Recreational values</u></p> <p>The adverse effects of use and development in the coastal marine area on recreational values shall be managed by providing for a diverse range of recreational opportunities while avoiding conflicts and safety issues.</p>	<ul style="list-style-type: none"> • Wainuiomata River • Island Bay at Derwent Street, Reef St Recreation Ground, and at the Surf Club • Owhiro Bay • Te Awarua-o-Porirua Harbour (Onepoto Arm) at Rowing Club • South Beach at Plimmerton, • Titahi Bay at South Beach Access Road • Wellington Harbour (Port Nicholson) at Harris Street, Hunter Street and Tory Street 	<p>catchment will be taken into account in the prioritisation of SCaMPs.</p> <p>P9(a) seeks to avoid, remedy, or mitigate any adverse effects on contact recreation and Māori customary use by providing water quality and, in rivers, flows suitable for contact recreation and Māori customary use. The SMS requires the consent holder to reduce the adverse effects of the stormwater discharges through universal measures, workstreams and capital delivery under the SCaMPs. Consequently, over time this is expected to result in a reduction in the adverse effects on water quality arising from stormwater discharges. Whether the enhancement of water quality is achieved will be dependent on a range of other factors outside of the scope of this consent alone.</p> <p>Consequently, it is considered that the proposal is consistent with these objectives and policies.</p>
<p>Māori relationships</p> <p><u>Objective O12</u></p> <p>The relationships of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga are recognised and provided for, including:</p> <p>(a) maintaining and improving opportunities for Māori customary use of the coastal marine area, rivers, lakes and their margins and natural wetlands, and</p>	<p>Several of the receiving environments for the discharges are Ngā Taonga Nui a Kiwa, sites with significant Mana Whenua values and / or included in statutory acknowledgements.</p>	<p>Wellington Water is working to ensure that Mana Whenua are active partners in resolving issues associated with the management of discharges of stormwater from the local authority stormwater network and that their values are identified and provided for through the consent application and the implementation of the consent. By doing so, Wellington Water is seeking to ensure that the concept of kaitiakitanga and the cultural relationship of Māori to the environments impacted by the stormwater discharges are central to the implementation of</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>(b) maintaining and improving the availability of mahinga kai species, in terms of quantity, quality and diversity, to support Māori customary harvest, and</p> <p>(c) providing for the relationship of mana whenua with Ngā Taonga Nui a Kiwa, including by maintaining or improving Ngā Taonga Nui a Kiwa so that the huanga identified in Schedule B are provided for, and</p> <p>(d) protecting sites with significant mana whenua values from use and development that will adversely affect their values and restoring those sites to a state where their characteristics and qualities sustain the identified values.</p> <p><u>Objective O13</u></p> <p>Kaitiakitanga is recognised and mana whenua actively participate in planning and decision-making in relation to the use, development and protection of natural and physical resources.</p> <p><u>Policy P18: Mauri</u></p> <p>The mauri of fresh and coastal waters shall be recognised as being important to Māori and is sustained and enhanced, including by:</p> <p>(a) managing the individual and cumulative adverse effects of activities that may impact on mauri in the manner set out in the rest of the Plan, and</p> <p>(b) providing for those activities that sustain and enhance mauri, and</p> <p>(c) recognising and providing for the role of kaitiaki in sustaining mauri.</p> <p><u>Policy P19: Mana whenua relationships with Ngā Taonga Nui a Kiwa</u></p> <p>The relationships between mana whenua and Ngā Huanga o Ngā Taonga Nui a Kiwa identified in Schedule B (Ngā</p>		<p>the consent. It is seeking to achieve this through several mechanisms.</p> <p>In the first instance, a review of Te Mahere Wai o Te Kāhui Taiao and of the Ngāti Toa Rangatira statement on Te Awarua-o-Porirua Whaitua Implementation Programme has been undertaken as part of this application to identify potential effects on cultural values. This assessment identifies the fresh and coastal water values held by Ngāti Toa and Taranaki Whānui.</p> <p>Under the conditions of the consent, Wellington Water is proposing that a full review of the Stormwater Monitoring Plan (SMP) will be undertaken by 2025 which will involve introducing a Mātauranga Māori element. This new element to the SMP will provide a detailed understanding of the values held by tangata whenua for freshwater and coastal water (expected to include mauri, mahinga kai and sites of significance), and how these values are impacted by the stormwater discharges. In addition, Wellington Water proposes to seek feedback from a Mātauranga Māori expert, or other party agreed to by Te Rūnanga o Toa Rangatira and Taranaki Whānui, as part of its updates of the SMS, and preparation of each SCaMP to ensure that the impacts on these values are progressively reduced through this consent.</p> <p>The Collaborative Committee is central to Wellington Water's proposal. This Committee will comprise an equal number of members from Mana Whenua and the consent holder.</p> <p>The overall purpose of the Collaborative Committee is to provide strategic direction to the consent holder to reduce the adverse effects of stormwater discharges over the term of the consent. To help achieve this purpose the functions of the Collaborative Committee in relation to stormwater discharges will include:</p> <ul style="list-style-type: none"> • Overseeing updates to and implementation of the Stormwater Management Strategy • Overseeing the preparation and implementation of the Sub-catchment Management Plans

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>Taonga Nui a Kiwa) will be recognised and provided for by:</p> <p>(a) having particular regard to the values and Ngā Taonga Nui a Kiwa huanga identified in Schedule B (Ngā Taonga Nui a Kiwa) when applying for, and making decisions on resource consent applications, and developing Whaitua Implementation Programmes, and</p> <p>(b) informing iwi authorities of relevant resource consents relating to Ngā Taonga Nui a Kiwa, and</p> <p>(c) recognising the relevant iwi authority/ies as an affected party under RMA s95E where activities risk having a minor or more than minor adverse effect on Ngā Huanga o Ngā Taonga Nui a Kiwa or on the significant values of a Schedule C site which is located downstream, and</p> <p>(d) working with mana whenua, landowners, and other interested parties as appropriate, to develop and implement restoration initiatives within Ngā Taonga Nui a Kiwa, and</p> <p>(e) the Wellington Regional Council and iwi authorities implementing kaupapa Māori monitoring of Ngā Taonga Nui a Kiwa.</p> <p><u>Policy P20: Māori values</u></p> <p>The cultural relationship of Māori with air, land and water shall be recognised and the adverse effects on this relationship and their values shall be minimised.</p> <p><u>Policy P21: Exercise of kaitiakitanga</u></p> <p>Kaitiakitanga shall be recognised and provided for by involving mana whenua in the assessment and decision-making processes associated with use and development of natural and physical resources including;</p>		<ul style="list-style-type: none"> • Overseeing the preparation of the Mātauranga Māori Monitoring Plan • Reviewing the Annual Report • Overseeing the preparation, updating, and implementation of the community engagement plan. <p>The Collaborative Committee structure has been designed to facilitate opportunities for Mana Whenua to exercise kaitiakitanga and to recognise the role of tangata whenua as kaitiaki.</p> <p>Based on the above assessment it is anticipated that the Collaborative Committee, SMS and SCaMPs will assist in meeting these RPS provisions. It is acknowledged however that this needs to be determined by Mana Whenua.</p>

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<p>(a) managing activities in sites with significant mana whenua values listed in Schedule C (mana whenua) in accordance with tikanga and kaupapa Māori as exercised by mana whenua, and</p> <p>(b) the identification and inclusion of mana whenua attributes and values in the kaitiaki information and monitoring strategy in accordance with Method M2, and</p> <p>(c) identification of mana whenua values and attributes and their application through tikanga and kaupapa Māori in the maintenance and enhancement of mana whenua relationships with Ngā Taonga Nui a Kiwa.</p>		
<p>Mana Whenua sites of significance</p> <p><u>Policy P48: Managing adverse effects on sites with significant mana whenua values</u></p> <p>Sites with significant mana whenua values identified in Schedule C shall be protected and restored by managing use and development in the following manner:</p> <p>(a) in the first instance, avoid locating activities within sites listed in Schedule C;</p> <p>(b) require any more than minor adverse effects of activities on the significant mana whenua values of the site to be evaluated through a cultural impact assessment undertaken by the relevant mana whenua as identified in Schedule C; and</p> <p>(c) significant adverse effects of an activity on the significant values of the site shall be avoided.</p> <p>(d) other adverse effects shall be managed in accordance with tikanga and kaupapa Maori responding to recommendations in the cultural impact assessment to:</p> <p>(i) avoid more than minor adverse effects on the significant values of the site; and</p>	<p>There are a number of receiving environments that are sites with significant Mana Whenua values identified in Schedule C. These include:</p> <ul style="list-style-type: none"> • Porirua Stream Mouth • Taupō pā • Taupō Stream Mouth • Wai-o-hata, Duck Creek • Tawhiti Kuri • Okowai (Papakowhai) lagoon • Karehana Stream • Takapūwāhia, Te Awarua-o-Poriura Harbour • Pauatahanui Reserve • Te Awa Kairangi (Hutt River) • Waiwhetu Stream - Owiti pā 	<p>Stormwater discharges do adversely impact on sites of significance to Mana Whenua. Where urban environments are located near to these sites of significance, specifically rivers, streams and coastal waters, there is generally a functional need for stormwater discharges to occur into these areas. This is because it is generally not feasible to locate the discharge elsewhere, i.e. to avoid the site, given distance topography, gradient etc. Adverse effects of discharges to Schedule C sites will be reduced through the implementation of the SMS and particularly the SCAmps. The development of the SCAmps will be prioritised through the SMS and it is expected that the values of sub-catchments and the level of adverse effects from stormwater discharges on each sub-catchment will be taken into account in the prioritisation of SCAmps.</p> <p>Further, the development of the SCAmps will be overseen by the Collaborative Committee and Wellington Water intends to also seek input from a Mātauranga Māori expert, or other party agreed to by Te Rūnanga o Toa Rangatira and Taranaki Whānui, as part of the preparation of each SCAmp. The need and opportunity for off-setting can be considered as part of this process. Amongst other things, the SMS and SCAmps are intended to ensure that the impacts on these Mana Whenua values are reduced through this consent and through a process</p>

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<p>(ii) where more than minor adverse effects cannot be avoided, minimising them, and</p> <p>(iii) where more than minor adverse effects cannot be avoided and/or minimised, they are remedied; and</p> <p>(e) where more than minor adverse effects on significant mana whenua values identified in Schedule C (mana whenua) cannot be avoided, minimised, or remedied, the activity is inappropriate. Offsetting of effects on sites with significant mana whenua values is inappropriate except where provided for in Policy P49, and</p> <p>(f) the relevant mana whenua as identified in Schedule C shall be considered to be an affected party under RMA s95E for all activities which require resource consent within a Schedule C site where the adverse effects are minor or more than minor, unless the application is publicly notified.</p> <p><u>Policy P49: Offsetting residual adverse effects on sites of significance to mana whenua</u></p> <p>Residual adverse effects that are not otherwise avoided, minimised or remedied in accordance with the management hierarchy in Policy P45 may be offset where the relevant mana whenua as identified in Schedule C:</p> <p>(a) considers the offsetting of residual adverse effects is appropriate in the particular circumstances, and</p> <p>(b) have:</p> <p>(i) an offsetting policy in place that applies to the area and values to be affected by the proposed development, or</p> <p>(ii) prepared a cultural impact assessment that includes specific direction for the offsetting of effects of the proposed activity on the site of significance, and</p>	<ul style="list-style-type: none"> • Korohiwa (East Harbour coast) • Te Korokoro o Te Mana (Korokoro Stream mouth) • Te Aro pā • Tapu te Ranga-Owhiro-Haewai • Te Raekaihau Point Reef • Whitireia • Takapūwāhia, Te Awarua-o-Porirua Harbour • Waiwhetū Stream - Owhiti pa 	<p>involving the active participation of Mana Whenua. This approach is considered to be consistent with Policy P48.</p> <p>However, it is acknowledged that this needs to be determined by Mana Whenua.</p>

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<p>(iii) expressly confirms that the offset proposed is consistent with:</p> <ol style="list-style-type: none"> 1. the offsetting policy in Policy P45A(b)(i) (where applicable), and 2. the cultural impact assessment in Policy P45A(b)(ii), and 3. the offsetting principles set out in Schedule G3. <p>Where offsetting is proposed for a site of significance that is associated with multiple mana whenua, there must be an agreed position between all groups that offsetting is appropriate and that (b) has been met.</p>		
<p>Water quality, aquatic ecosystem health, mahinga kai <u>Objective O17</u> The quality of groundwater, water in surface water bodies and the coastal marine area is maintained or improved.</p> <p><u>Objective O18</u> Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use, including by:</p> <p>(a) maintaining water quality, or (b) improving water quality in:</p> <ol style="list-style-type: none"> (i) significant contact recreation freshwater bodies and sites with significant mana whenua values identified in Schedule C and Ngā Taonga Nui a Kiwa identified in Schedule B to meet, as a minimum and within reasonable timeframes, the primary contact recreation objectives in Table 3.1, and (ii) coastal water and sites with significant mana whenua values identified in Schedule C and Ngā Taonga Nui a Kiwa identified in Schedule B to meet, as a minimum and within reasonable timeframes, the 	<p>The pNRP contains this note in respect of Objectives O18 and O19</p> <p>For the purposes of this objective 'a reasonable timeframe' is a date for the applicable water body or coastal marine area inserted into this Plan through the plan change/s required by the RMA to implement the NPS-FM 2020, or 2050 if no other date is specified by 31 December 2026.</p> <p>There are a number of receiving environments that are sites with significant Mana Whenua values identified in Schedule C. These sites are listed above.</p>	<p>The Part 2 Report: AEE assesses the current state of the sub-catchments against pNRP Objective O18 (suitability for contact recreation) and Objective O19 (biodiversity, aquatic ecosystem health and mahinga kai). This assessment identifies that there are a number of receiving waterbodies that do not meet the O18 and O19 objectives, albeit that this state has arisen due to effects of a variety of contaminant sources including but not limited to the discharge of stormwater from the local authority stormwater network.</p> <p>For the purpose of assessing this application against Objectives O18 and O19 (and the related policies), it has been assumed, based on the Part 2 Report findings, that the requirement that applies is that the water quality in the sub-catchments shall be improved.</p> <p>The proposed SMS and SCaMPs are designed to reduce the adverse effects of stormwater discharges on water quality over the term of the consent. This will contribute to improving the quality of water in the sub-catchments as sought by the Objectives. It is expected that the values of sub-catchments (including where a water body is listed in Schedule H2) and the level of adverse effects from stormwater discharges on each sub-</p>

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<p>primary contact recreation objectives in Table 3.3, and</p> <p>(iii) all other rivers and lakes and natural wetlands to meet, as a minimum and within reasonable timeframes, the secondary contact recreation objectives in Table 3.2.</p> <p><u>Policy P77: Improving water quality for contact recreation and Māori customary use</u></p> <p>The quality of freshwater bodies and coastal water shall be improved to meet, over time and as a minimum, the objectives in Table 3.1, 3.2 and 3.3, including by:</p> <p>a) improving water quality in all first priority for improvement water bodies for secondary contact with water listed in Schedule H2 (priority water bodies) in accordance with Method M34, and</p> <p>b) having particular regard to improving water quality in freshwater bodies and coastal water where contact recreation and/or Māori customary use are adversely affected by discharges from stormwater from a port, airport or state highway, wastewater networks and wastewater treatment plants.</p> <p><u>Objective O19</u></p> <p>Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded such that:</p> <p>a) water quality, flows, water levels and aquatic and coastal habitats are managed to maintain biodiversity aquatic ecosystem health and mahinga kai, and</p> <p>b) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a freshwater body or coastal marine area is meaningfully improved so that the objective is met within a reasonable timeframe.</p>	<p>There are also receiving environments that are Ngā Taonga Nui a Kiwa identified in Schedule B.</p>	<p>catchment will be taken into account in the prioritisation of SCaMPs.</p> <p>In terms of P78, clause (a), the application includes the SMS which sets out measures to manage the adverse effects of stormwater discharges, including universal measures and work streams and the prioritisation of SCaMPs. The SCaMPs, to be developed progressively under the SMS, will set out the specific capital investment that will be implemented in each sub-catchment to ensure the adverse effects from the stormwater discharges will be reduced over the term of the consent.</p> <p>In terms of P78, clause (b), this resource consent will manage new stormwater discharges through the developer-led SCaMPs under the SMS or through Wellington Water led SCaMPs to ensure that new discharges arising as a result of growth and development do not contribute to a deterioration of water quality relevant to O18 and O19.</p> <p>Consequently, it is considered that the proposal is consistent with these objectives and policies.</p>

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<p>(c) restoration of aquatic ecosystem health and mahinga kai is encouraged.</p> <p><u>Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai</u></p> <p>Manage the adverse effects of use and development on biodiversity, aquatic ecosystem health and mahinga kai to:</p> <p><i>Water quality</i></p> <p>(b) maintain or improve water quality including to assist with achieving the objectives in Tables 3.4, 3.5, 3.6, 3.7 and 3.8 of Objective O19, and</p> <p><i>Aquatic habitat diversity and quality</i></p> <p>(c) maintain or where practicable restore aquatic habitat diversity and quality, including:</p> <ul style="list-style-type: none"> (i) the form, frequency and pattern of pools, runs, and riffles in rivers, and (ii) the natural form of rivers, lakes, natural wetlands and the coastal marine area, and <p>(d) where practicable restore the connections between fragmented aquatic habitats, and</p> <p><i>Critical habitat for indigenous aquatic species and indigenous birds</i></p> <p>(e) maintain or where practicable restore habitats that are important to the life cycle and survival of indigenous aquatic species and the habitats of indigenous birds in the coastal marine area, natural wetlands and the beds of lakes and rivers and their margins that are used for breeding, roosting, feeding, and migration, and</p> <p><i>Critical life cycle periods</i></p> <p>(f) avoid, minimise or remedy adverse effects on aquatic species at times which will most affect the breeding, spawning, and dispersal or migration of those species,</p>		

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<p>including timing the activity, or the adverse effects of the activity, to avoid times of the year when adverse effects may be more significant, and</p> <p><i>Riparian habitats</i></p> <p>(g) maintain or where practicable restore riparian habitats, and</p> <p><u>Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai</u></p> <p>Where an objective in Table 3.4, Table 3.5, Table 3.6, Table 3.7 or Table 3.8 of Objective O19 is not met, point source discharges to water shall be managed in the following way:</p> <p>a) for an existing discharge that contributes to the objective(s) not being met, the discharge is only appropriate if:</p> <ul style="list-style-type: none"> i. at a minimum an application for a resource consent includes a defined programme of work for upgrading the discharge, in accordance with good management practice, within the term of the resource consent, and ii. conditions on the resource consent require the adverse effects of the discharge to be minimised in order to improve water quality in relation to the objective(s) not met, and iii. in determining the improvement to water quality required in (ii), and the timeframe in which it is to be achieved, consideration will be given to the discharge's contribution to the objective(s) not being met <p>(b) for a new discharge, the discharge is inappropriate if the discharge would cause the affected fresh water body or area of coastal water to decline in relation to the objective(s), except that a new temporary discharge to coastal water from a wastewater network or wastewater</p>		

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<p>treatment plant to facilitate maintenance, repair, replacement or upgrade work that has temporary adverse effects may not be inappropriate.</p> <p><u>Policy P110: Loss of extent and values of the beds of lakes and rivers, and natural wetlands</u></p> <p>The loss of extent and values of the beds of lakes and rivers and natural wetlands, including as a result of reclamation and drainage, is avoided, except where:</p> <p>(a) in a natural inland wetland:</p> <p>(i) the loss of extent or values arises from any of the following:</p> <ol style="list-style-type: none"> 1. ... 6. the maintenance or operation of specified infrastructure, or other infrastructure, or 7. .., <p>or</p> <p>(ii) for specified infrastructure:</p> <ol style="list-style-type: none"> 1. the activity, including any reclamation and drainage, is necessary for the construction or upgrade of specified infrastructure, and 2. the specified infrastructure will provide significant national or regional benefits, and 3. there is a functional need for the specified infrastructure in that location, <p>(b) in a river:</p> <p>(i) there is a functional need for the activity in that location; and</p> <p>(ii) any reclamation or drainage is:</p> <ol style="list-style-type: none"> 1. ... <p>(c) in a lake the reclamation or drainage is:</p> <p>(i)</p>		<p>In terms of P110 it is noted that the Part 2 Report: AEE has identified 12 sub-catchments where the overall level of effect of the stormwater discharges is assessed as moderate (i.e. more than minor) or above. The AEE also identifies there are some natural wetlands, in Schedule F3 of the pNRP, which are also impacted by more than minor adverse effects from the stormwater discharges. Consequently, it cannot be said that the loss of river or wetland values is currently avoided.</p> <p>With respect to natural wetlands it is noted that the loss of values, where this occurs, is the result of the operation of specified infrastructure as provided for under clause (a) (i) (6).</p> <p>With respect to the potential loss of river or stream values it is considered that there is a functional need for the stormwater discharges to discharge to rivers and streams. The discharges generally need to occur close to the urban environment from which the stormwater run-off originated. This is because it is not feasible to locate the discharges elsewhere (given distance, topography, gradient etc).</p> <p>Further with respect to the adverse effects on both natural wetlands and rivers, it is considered that the approach proposed for the SMS and SCaMPs is consistent with the effects management hierarchy because:</p> <ul style="list-style-type: none"> • It is expected that the values of sub-catchments and the level of adverse effects from stormwater discharges on each sub-catchment will be taken into account in the prioritisation of

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<p>Note</p> <p>The effects of any activity that requires a resource consent under this policy will be managed through applying the effects management hierarchy as set out in Policies P31, P37, P38, or P48</p>		<p>SCaMPsThe universal measures and work streams in the SMS, and the SCaMPs are designed to progressively reduce the effects of the stormwater discharges overtime.</p> <ul style="list-style-type: none"> In the development of the SCaMPs, Wellington Water will consider and seek to address localised effects such a scouring and stream bank erosion that have arisen as a result of stormwater discharges.
<p>Sites with significant indigenous biodiversity values <u>Objective O28</u></p> <p>Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.</p> <p><u>Policy P31: Adverse effects on biodiversity, aquatic ecosystem health and mahinga kai</u></p> <p>Adverse effects on biodiversity, aquatic ecosystem health and mahinga kai shall be managed by:</p> <p>a) in the first instance, activities that risk causing adverse effects on the values of a Schedule F ecosystem or habitat, other than activities carried out in accordance with a wetland restoration management plan, shall avoid these ecosystems and habitats. If the ecosystem or habitat cannot be avoided, the adverse effects of activities shall be managed by (b) to (g) below.</p> <p>b) avoiding adverse effects where practicable, and</p> <p>c) where adverse effects cannot be avoided, minimising them where practicable, and</p> <p>d) where adverse effects cannot be minimised, they are remedied except as provided for in (a) to (g), and</p>	<p>Several of the receiving environments for the discharges are included in Schedules F1, F2 F4 and F5 (see the Part 2 AEE).</p>	<p>The purpose of the proposed SCaMPs is to reduce the adverse effects from the stormwater discharges in each sub-catchment. It is expected that the values of sub-catchments and the level of adverse effects from stormwater discharges on each sub-catchment will be taken into account in the prioritisation of SCaMPs. While these efforts on their own will not restore the waterbodies to healthy functioning state (where this does not currently exist), it will contribute towards the objective in O28.</p> <p>P31 sets up a hierarchy for managing effects biodiversity, aquatic ecosystem health and mahinga kai. As previously discussed, because the stormwater network is designed to discharge into fresh and coastal waters relatively near to the source of the run-off, discharging to locations which are recognised as having indigenous biodiversity values cannot always be avoided. Mitigation measures are set out in the SMS, and detailed sub-catchment capital improvements will be implemented through the SCaMPs, which will be progressively prioritised for improvement in the SMS. If the need for offsetting is identified, offsetting and/or compensation initiatives could be developed and implemented through the SCaMPs. It is therefore considered that the proposal is consistent with these provisions.</p>

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<p>e) where more than minor residual adverse effects cannot be avoided, minimised, or remedied, biodiversity offsetting is provided where possible and</p> <p>(f) if biodiversity offsetting of more than minor residual adverse effects is not possible, biodiversity compensation is provided, and</p> <p>(g) the activity itself is avoided if biodiversity compensation cannot be undertaken in a way that is appropriate as set out in Schedule G3, including Clause 2 of that Schedule.</p> <p>In relation to activities within the beds of lakes, rivers and natural wetlands, (e) to (g) only apply to activities which meet the exceptions in Policy P102.</p> <p>A precautionary approach shall be used when assessing the potential for adverse effects on ecosystems and habitats with significant indigenous biodiversity values identified in Schedule F.</p> <p><u>Policy P38: Indigenous biodiversity values within the coastal marine area</u></p> <p>To protect the indigenous biodiversity values of aquatic ecosystems, habitats and species, use and development within the coastal environment shall:</p> <p>(a) avoid adverse effects on indigenous biodiversity values that meet the criteria in Policy 11(a) of the New Zealand Coastal Policy Statement (NZCPS) namely:</p> <ul style="list-style-type: none"> (i) indigenous taxa listed as threatened or at risk in the NZ Threat classification system lists or as threatened by the International Union for Conservation of Nature and Natural Resources; (ii) indigenous ecosystems and vegetation types in the coastal environment area that are threatened or are naturally rare; 		<p>The discharges occur at a variety of locations in the coastal environment. Given the highly distributed nature of the stormwater discharges it is not possible to be certain that the discharges will avoid adverse effects on the values identified in P38 in all instances. It is also very difficult to determine the contribution the discharge makes to the adverse effects on indigenous biodiversity values.</p> <p>As previously discussed in relation to Policy 31, the SCaMPs are designed to reduce the adverse effects from the stormwater discharges within the sub-catchments over the term of this consent, and will provide the opportunity to consider localised effects at more detailed level than is practical in this global consent application.</p> <p>In addition, it is noted that Policy P39 provides the opportunity to provide for the operation of existing regionally significant infrastructure in areas with these values where certain criteria</p>

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<p>(iii) habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare;</p> <p>(iv) areas in the coastal environment containing nationally significant examples of indigenous community types;</p> <p>(v) areas set aside for full or partial protection of indigenous biological diversity under other legislation.</p> <p>(b) avoid significant adverse effects, on indigenous biodiversity values that meet the criteria in Policy 11(b) (i) – (vi) of the NZCPS, and</p> <p>(c) manage non-significant adverse effects of activities on indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS by:</p> <ul style="list-style-type: none"> (i) avoiding adverse effects where practicable, and (ii) where adverse effects cannot be avoided, minimising them where practicable, and (iii) where adverse effects cannot be minimised they are remedied where practicable, and (iv) where residual adverse effects cannot be avoided, minimised, or remedied, biodiversity offsetting is provided where possible, and (v) if biodiversity offsetting of residual adverse effects is not possible, the activity itself is avoided unless the activity is regionally significant infrastructure then biodiversity compensation is provided, and (vi) the activity itself is avoided if biodiversity compensation cannot be undertaken in a way that is appropriate as set out in Schedule G3, including Clause 2 of that schedule, and <p>(a) for all other sites within the coastal environment not meeting Policy 11(a) or (b) of</p>		<p>are met. The assessment of Policy P39 below demonstrates that these criteria can be met. It is expected that any new stormwater discharges will not be located within Schedule F5 sites or will be appropriately managed.</p> <p>In terms of Policy P39 clauses (a) and (b), given that parts of the urban environment and its stormwater network are located near to the CMA, discharges from these parts of the network are functionally dependent on being located in the CMA. This is because it will generally not be feasible or practicable to locate the discharge elsewhere, given distance topography, gradient etc.</p> <p>In terms of P39, clause (c), the SMS and the development and implementation of the SCaMPs will reduce the adverse effects of the stormwater discharges, including any new stormwater discharges, on the indigenous biodiversity values of the receiving environment.</p> <p>Given the above assessment, it is considered that the criteria set out in clauses (a) to (c) can be met and the operation of the stormwater network, both existing and future, should be provided for within the coastal environment.</p>

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<p>the NZCPS, manage significant adverse effects on indigenous biodiversity values using the effects management hierarchy set out in (b) to (g) of Policy P31.</p> <p><u>Policy P39: Existing Regionally Significant Infrastructure and renewable energy generation activities within a site that meets any of the criteria in Policy P38(a)(i) – (v) or (b) or included in Schedule F5</u></p> <p>Consider providing for the operation, maintenance, upgrade and extension of existing Regionally Significant Infrastructure and renewable energy generation activities within a site in the coastal environment that meets any of the criteria in Policy P38(a)(i) – (v) or (b) or included in Schedule F5 where:</p> <p>(a) there is a functional need or operational requirement for the activity to locate in that area, and</p> <p>(b) there is no practicable alternative on land or elsewhere in the coastal environment for the activity to be located, and</p> <p>(c) the activity provides for the maintenance and, where practicable, the enhancement or restoration of the affected significant indigenous biodiversity values and attributes at, and in proximity to, the affected area, taking into account any consultation with the Wellington Regional Council, the Department of Conservation and mana whenua.</p> <p><u>Policy P42: Ecosystems and habitats with significant indigenous biodiversity values</u></p> <p>Protect in accordance with Policy P31 and Policies P38-P41 and where appropriate restore the following ecosystems and habitats with significant indigenous biodiversity values:</p>		<p>The Part 2 Report: AEE sets out the sub-catchments that contain the values that Policy P42 seeks to protect. As previously discussed in relation to Policy 31, the development and implementation of the SCaMPs will progressively enhance the adverse effects of the stormwater discharges on the indigenous biodiversity values of the receiving environment.</p> <p>In terms of P42(c), the stormwater covered by this application discharges to a number of wetlands identified in Schedule F3.</p>

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<p>a) the rivers and lakes with significant indigenous ecosystems identified in Schedule F1 (rivers/lakes), and</p> <p>b) the habitats for indigenous birds identified in Schedule F2 (bird habitats), and</p> <p>c) significant natural wetlands, including the significant natural wetlands identified in Schedule F3 (identified significant natural wetlands), and</p> <p>d) the ecosystems and habitat-types with significant indigenous biodiversity values in the coastal marine area identified in Schedule F4 (coastal sites) and Schedule F5 (coastal habitats).</p> <p>Notes</p> <p>All natural wetlands in the Wellington Region are considered to be ecosystems and habitats with significant indigenous biodiversity values as they meet at least two of the criteria listed in Policy 23 of the Regional Policy Statement 2013 for identifying indigenous ecosystems and habitats with significant indigenous biodiversity values; being representativeness and rarity.</p> <p><u>Policy P43: Effects on the spawning and migration of indigenous fish species</u></p> <p>Avoid more than minor adverse effects of activities on indigenous fish species known to be present in any water body identified in Schedule F1 (rivers/lakes) as habitat for indigenous fish species, and or Schedule F1b (inanga spawning habitats), during known spawning and migration times identified in Schedule F1a (fish spawning/migration). These activities may include the following:</p> <p>(a) discharges of contaminants, including sediment, and</p>		<p>Overall, the development and implementation of the SCaMPs for the sub-catchments which contain these wetlands should reduce any potential adverse effects that the stormwater discharges are having on these wetlands.</p> <p>P43 seeks to avoid more than minor adverse effects on indigenous fish species known to be present in any water body identified in Schedule F1 and F1b. The Part 2 AEE identifies waterbodies that are listed in Schedules and F1 and F1b. The potential impacts of stormwater on these values will be addressed through the measures in the SMS and the sub-catchment specific capital intervention in the SCaMPs.</p> <p>The implementation of the consent in accordance with proposed resource consent conditions discussed in the above assessments will over the term of the consent assist in progressing the protection of ecosystems and habitats with significant indigenous biodiversity values. Consequently, it is considered that the proposal is consistent with these objectives and policies.</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>(b) disturbance of the bed or banks that would significantly affect spawning habitat at peak times of the year, and</p> <p>(c) damming, diversion or taking of water which leads to significant loss of flow or which makes the river impassable to migrating indigenous fish.</p> <p><u>Policy P44 Managing effects on ecosystems and habitats with significant indigenous biodiversity values from activities outside these ecosystems and habitats</u></p> <p>In order to protect the ecosystems and habitats with significant indigenous biodiversity values in accordance with Policy P42, particular regard shall be given to managing the adverse effects of use and development in areas outside of these ecosystems and habitats on physical, chemical and biological processes to:</p> <p>(a) maintain ecological connections within and between these habitats, or</p> <p>(b) provide for the enhancement of ecological connectivity between fragmented habitats through biodiversity offsets, and</p> <p>(c) provide adequate buffers around ecosystems and habitats with significant indigenous biodiversity values, and</p> <p>(d) avoid cumulative adverse effects on, and the incremental loss of significant indigenous biodiversity values.</p>		
<p>Wetlands and outstanding waterbodies</p> <p><u>Objective O22</u></p> <p>The extent of natural wetlands is maintained or increased, their values are protected, and their condition is restored. Where the values relate to biodiversity, aquatic</p>	<p>Several of the receiving environments for the discharges are included in Schedules A and F3 as listed below.</p>	<p>The stormwater discharges covered by this application discharge to three outstanding wetlands which are the Taupō Swamp, Pauatahanui Inlet Saltmarsh and the Pauatahanui Inlet Tidal Flats. The Part 2 Report: AEE identifies that the magnitude of stormwater discharge effects on the Taupō Swamp is low, and while the swamp has a very high ecological value, the overall level of adverse effect is low. The Part 2 AEE also states that there is</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>ecosystem health and mahinga kai, restoration is to a healthy functioning state as defined by Table 3.7.</p> <p><u>Objective O25</u></p> <p>Outstanding water bodies identified in Schedule A (outstanding water bodies) and their significant values are protected and restored. Where the significant values relate to biodiversity, aquatic ecosystem health and mahinga kai, restoration is to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.</p> <p><u>Policy P34: Values of wetlands</u></p> <p>Activities in and adjacent to natural wetlands shall be managed to maintain and, where appropriate, restore their condition and their values including:</p> <p>(a) as habitat for indigenous flora and fauna, and (b) for their significance to mana whenua, and (c) for their role in the hydrological cycle including flood protection, and (d) for nutrient attenuation and sediment trapping, and (e) as a fisheries resource, and (f) for recreation, and (g) for education and scientific research.</p> <p><u>Policy P36: Restoring Te Awarua-o-Porirua Harbour, Wellington Harbour (Port Nicholson) and Wairarapa Moana</u></p> <p>The ecological health and significant values of Te Awarua-o-Porirua Harbour, Wellington Harbour (Port Nicholson) and Wairarapa Moana will be restored including by:</p> <p>(a) managing activities, erosion-prone land, and riparian margins to reduce sedimentation rates and pollutant inputs, to meet the water quality, aquatic ecosystem</p>	<p>Outstanding wetlands (Schedule A):</p> <ul style="list-style-type: none"> • Taupō Swamp Complex • Pāuatahanui Inlet Saltmarsh • Pāuatahanui Inlet Tidal Flats <p>Identified Natural wetlands (Schedule F3):</p> <ul style="list-style-type: none"> • Papakowhai Bush • Papakowhai Lagoon • Romesdale Lagoon • Te Awa Kairangi/ Hutt River mouth • Duck Creek Saltmarsh • Te Awarua o Porirua Harbour (Onepoto Arm) – Tidal Flats • Muri Road wetland 	<p>currently no evidence to suggest that urban stormwater related contaminants (such as copper or zinc) have had more than a minor adverse effect on the Pauatahanui Inlet Saltmarsh or the Pauatahanui Inlet Tidal Flats. The major concern remains sediment load, of which a very small proportion is within the scope of the consent.</p> <p>Other natural wetlands are also impacted by the discharge of stormwater. Of those identified in Schedule F3 of the pNRP, the AEE assesses the level of adverse effect from the discharge of urban stormwater as low for the Muri Road wetland, Romesdale Lagoon, Papakowhai Bush, Papakowhai Lagoon, and Te Awa Kairangi/ Hutt River mouth. The adverse effects of stormwater discharges for the Duck Creek saltmarsh are assessed as low to moderate and the adverse effects on the Te Awarua o Porirua Harbour (Onepoto Arm) – Tidal Flats are assessed as being moderate to high.</p> <p>The implementation of the SMS and the development and implementation of the SCaMPs for the sub-catchments which contain these wetlands will reduce the adverse effects that the stormwater discharges are having on these wetlands in manner consistent with these objectives and policies.</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>health and mahinga kai objectives set out in Tables 3.4 to 3.8, and</p> <p>(b) undertaking planting and pest management programmes in harbour and lake habitats and ecosystems.</p> <p><u>Policy P37: Adverse effects on outstanding water bodies</u></p> <p>The adverse effects of use and development on outstanding water bodies and their significant values identified in Schedule A (outstanding water bodies) shall be avoided, unless there is a functional need for operation, maintenance or upgrade of existing Regionally Significant Infrastructure in which case adverse effects of activities shall be managed by:</p> <p>(a) avoiding adverse effects where practicable, and</p> <p>(b) where adverse effects cannot be avoided, minimising them, and</p> <p>(c) where adverse effects cannot be minimised, they are remedied where practicable, and</p> <p>(d) where residual adverse effects cannot be avoided, minimised, or remedied, offsetting is provided where possible.</p> <p>Proposals for biodiversity mitigation and biodiversity offsetting will be assessed against the principles listed in Schedule G1 (biodiversity mitigation), and Schedule G2 (biodiversity offsetting). A precautionary approach shall be used when assessing the potential for adverse effects on outstanding water bodies.</p> <p>Where more than minor adverse effects on outstanding water bodies cannot be avoided, minimised, remedied or redressed through biodiversity offsets, the activity is inappropriate.</p>		

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<p>Natural Character and Landscapes</p> <p><u>Objective O14</u></p> <p>The natural character of the coastal marine area, natural wetlands, and rivers, lakes and their margins is preserved and protected from inappropriate use and development.</p> <p><u>Objective O26</u></p> <p>Outstanding natural features and landscapes and their values are protected from inappropriate use and development.</p> <p><u>Policy P24: Preserving and protecting natural character from inappropriate use and development</u></p> <p>To preserve natural character and protect it from inappropriate use and development by:</p> <p>(a) avoiding adverse effects of activities on the natural character of areas within the coastal environment that have outstanding natural character, and</p> <p>(b) avoiding significant adverse effects and avoid remedy and mitigate other adverse effects of activities on the natural character of areas within the coastal environment that do not have outstanding natural character, and</p> <p>(c) outside the coastal environment, avoiding and, where avoidance is not practicable, remedying or mitigating adverse effects of activities on the natural character of wetlands, rivers, lakes and their margins that have outstanding natural character, provided that the outstanding natural character of the area taken as a whole is retained, and</p> <p>(d) outside the coastal environment, avoiding and, where avoidance is not practicable, remedying or mitigating significant adverse effects of activities on the natural character of wetlands, rivers, lakes and their margins that have high natural character, provided that the high</p>		<p>The discharges occur at a variety of locations in the coastal and freshwater environment. Given the nature of the discharges it is difficult to determine the contribution that the discharge makes to any adverse effects on the coastal and freshwater environments.</p> <p>It is noted however, that:</p> <ul style="list-style-type: none"> • The SMS describes how Wellington Water will minimise contamination from discharges from the local authority stormwater networks. This will be achieved through implementing two new targeted workstreams: Workstream 1 will deliver universal responses and water quality programmes and Workstream 2 will deliver SCaMPs and resulting capital improvements.. • The Sub-Catchment Management Plans (SCaMPs) are designed to develop a programme of stormwater network improvement works to reduce the adverse effects of stormwater discharges for each sub-catchment over the term of the consent. <p>The SMS will set out the prioritisation of SCaMPs. Implementation of the SCaMPs will over the term of the consent assist in safeguarding the integrity, form, functioning and resilience of the coastal environment, sustaining its ecosystems and preserving natural character.</p> <p>Further, it is considered that given the stormwater discharges from the local authority stormwater network are intermittent, temporary, and of short duration, and taking into account the state of the receiving environment during these events, any adverse effects will not prevent the natural character of the receiving environments from being preserved.</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>natural character of the area taken as a whole is retained, and</p> <p>(e) outside the coastal environment, avoiding, remedying or mitigating other adverse effects of activities on the natural character of wetlands, rivers, lakes and their margins that are not addressed under (c) or (d) of Policy P24.</p> <p><u>Policy P52: Protecting natural features and landscapes from inappropriate use and development</u></p> <p>To protect natural features and landscapes (including seascapes) of the coastal environment, rivers, lakes and their margins and natural wetlands and their values, from inappropriate use and development by:</p> <p>(a) avoiding adverse effects of activities on the natural attributes and characteristics of outstanding natural features and landscapes in the coastal environment, and</p> <p>(b) avoiding significant adverse effects of activities on the natural attributes and characteristics of natural features and landscapes in the coastal environment and avoid, remedy and mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment, and</p> <p>(c) outside the coastal environment, avoiding and, where avoidance is not practicable, remedying or mitigating adverse effects of activities on the natural attributes and characteristics of outstanding natural features and landscapes, provided that the values of the natural features or landscapes that contribute to its outstanding status are retained.</p>		
<p>Wastewater and stormwater interactions</p> <p><u>Policy P87: Minimising wastewater and stormwater interactions</u></p>	<p>The application includes consent for the discharge of wet weather overflows</p>	<p>There are limited sources of wastewater contamination covered within this consent application (there are other consents that will address this). The implementation of the SMS and SCaMPs will reduce the adverse effects on water quality from the stormwater</p>

Key Objectives / Policies	Relevance / Discussion	Assessment
<p>The adverse effects of wastewater and stormwater interactions on fresh and coastal water shall be minimised by:</p> <ul style="list-style-type: none"> (a) avoiding wastewater contamination of stormwater from new wastewater networks or connections authorised after the date of 31 July 2015, and (b) removal of existing wastewater contamination of stormwater progressively, and as soon as reasonably practicable, and (c) progressively reducing stormwater and groundwater infiltration and inflow into the wastewater network. <p><u>Policy P88: Assessing resource consents to discharge stormwater containing wastewater</u></p> <p>A resource consent application under Rule R53 to discharge stormwater from a local authority stormwater network known to contain wastewater is inappropriate unless the application includes:</p> <ul style="list-style-type: none"> (a) a plan of how Policy P87 will be achieved, including key milestones and dates, and (b) the results of consultation with mana whenua on their values and interests in relation to discharges and receiving waters. 	<p>from the stormwater network.</p>	<p>discharges across the extent of the global consent and in each sub-catchment. As part of the SMS, Wellington Water will implement workstreams to respond to acute human health risks resulting from stormwater discharges, similar to requirements in the Stage 1 consent. Wellington Water is continuing to develop these workstreams based on lessons learnt during the implementation of the stage 1 consent. More information will be provided prior to the hearing. This is expected to involve working with property owners to fix the lateral pipes which will work to reduce the number of wastewater cross-connections to the stormwater network which discharges into the coastal environment over the term of the consent.</p> <p>Based on the above assessments it is considered the proposal is consistent with these policies on wastewater / stormwater interaction.</p>