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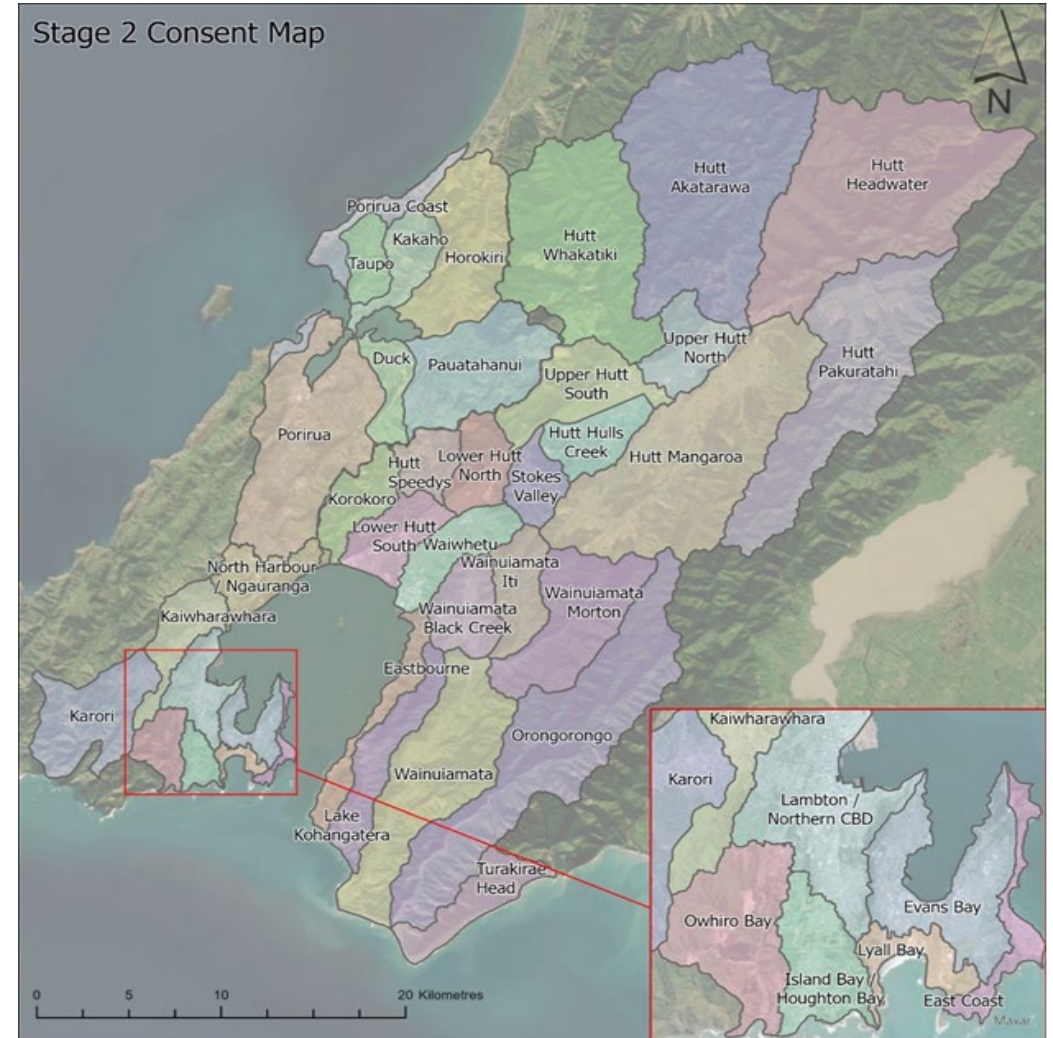
NETWORK DISCHARGE CONSENTS FOR WELLINGTON – KEY CHALLENGES AND LESSONS LEARNED



water
NEW ZEALAND
CONFERENCE & EXPO
17-19 OCTOBER 2023
Tākina, Te Whanganui-a-Tara Wellington

Background

- Stormwater network discharges and wet weather overflows from wastewater networks
- Global consents covering four councils
- Proposal broadly based on:
 - Partnership with mana whenua
 - Engagement with the community
 - Progressive roll out of sub-catchment planning
 - Network wide measures in the interim



Lessons for the network operator

1. You must have regulator on board and bring them along in the process
2. Constantly changing context, have to just roll with it and have processes in place
3. Sub-catchment sequencing

Planning lessons learnt

- Partnering with Mana Whenua
 - Fundamental to AEE, sequencing & identifying responses over the consent term
- Maintaining, while there is progressive improvement
 - Maintaining is a bottom line in the NPS-FM
 - How does that fit with a progressive role out of sub-catchment planning
- The planning framework does not reflect some of the practicalities

Legal lessons learnt

- Information challenges for 'global' consents
 - Not realistic to have same information as for single point source discharge
 - Highly dependent on modelling
 - Challenging 'existing environment' for stormwater
- Navigating the policy framework
 - Directive protective provisions in NZCPS, NPS-FM
 - Not much in the way of 'enabling' provisions
 - Inconsistent approaches at regional plan level
- Need for national direction and clear standards

Thank you

Wellington Water,
Stantec, Dentons



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