

Before the Hutt City Council Proposed District Plan – Hearing Stream 6

Under the Resource Management Act 1991 (the Act)

In the matter of the Hutt City Council Proposed District Plan (Hearing Stream 6)

Between **Hutt City Council**
Local authority

And **Tiaki Wai Ltd** (previously Wellington Water Limited)
Submitter 422 and Further Submitter F36

Planning Evidence of Timothy Michael Blackman for Tiaki Wai Ltd (formerly Wellington Water Ltd)

Date: 7 September 2026

Planning Evidence of Timothy Michael Blackman

Introduction

1. My full name is Timothy Michael Blackman. I am employed as a Principal Advisor Environmental Planning at Tiaki Wai Limited (**Tiaki Wai**).
2. Tiaki Wai was established on 1 July 2026 to assume responsibility for the delivery and management of three water services previously undertaken by Wellington Water Limited. Unlike Wellington Water Limited, which managed water infrastructure on behalf of its council shareholders, Tiaki Wai owns and operates the three waters assets within the metropolitan Wellington area, including the Hutt Valley.
3. For the purposes these proceedings Tiaki Wai is Wellington Water Limited's successor in accordance with section 2A of the Resource Management Act 1991 (**RMA**). At Appendix A I have provided a brief overview of activities that Tiaki Wai undertakes.
4. I am authorised to give this evidence on behalf of Tiaki Wai.
5. Although I am employed by Tiaki Wai I have prepared this evidence drawing on my experience and expertise as a planner.

Qualifications and experience

6. I hold a degree in Physical Geography (2004) and a Master of Planning (2006) from Otago University.
7. I am a full member of the New Zealand Planning Institute.
8. I have more than 14 years of planning experience, with a focus on plan making and resource consenting.
9. As noted, I am employed as a Principal Advisor Environmental Planning in the Resource Management and Environment Team at Tiaki Wai (formerly Wellington Water). I was employed by Wellington Water as a Senior Advisor Environmental Planning between March 2023 – February 2024.
10. The Resource Management and Environment Team is a specialist team within Tiaki Wai that provides environmental planning, consenting, compliance and regulatory advice to support the delivery of water services. This includes:
 - 10.1. Seeking resource consents, and related approvals, required to enable the operation, maintenance, use, upgrade and renewal of three waters assets and services;

- 10.2. Advice on the interpretation and application of resource consents, planning instruments and environmental legislation, including whether activities can be undertaken as permitted activities or require resource consent; and
- 10.3. Review and provision of specialist advice on environmental policy, planning and regulatory reform, including plan development.
- 11. Since working at Wellington Water and Tiaki Wai I have provided consenting advice for water infrastructure projects across the metropolitan area, including within Hutt City Council's jurisdiction. A recent key focus of the work I deliver for Tiaki Wai is in relation to network discharges and discharges from wastewater treatment plants.
- 12. Prior to Tiaki Wai, I held the position of Senior Policy Advisor at Greater Wellington Regional Council between September 2017 – February 2023. I worked as a Policy Planner at Gisborne District Council between January 2014 – August 2017.
- 13. Before this time, I worked a variety of different planning and planning related roles, such as, Planner at Beca (Auckland) between April 2007 – December 2008.

Code of Conduct

- 14. Although this matter is not before the Environment Court, I confirm that I have read the 'Code of Conduct for Expert Witnesses' in the Environment Court Practice Note 2023 and have complied with it when preparing my written statement of evidence, and will do so when I give oral evidence before the Hearings Panel. In particular, unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Scope of Evidence

- 15. I am presenting this evidence in support of the submissions, and further submissions, originally made by Wellington Water in relation to the proposed Hutt City District Plan.
- 16. My evidence addresses the provisions relating to both infrastructure and three waters infrastructure.
- 17. In relation to the infrastructure chapter I address:
 - 17.1. Recognition of Reverse Sensitivity Effects,
 - 17.2. Recognition of Three Waters Infrastructure,

- 17.3. Proposed Changes to INF-P9,
- 17.4. Provision for Upgrades in Active Street Frontage Overlay INF-P14,
- 17.5. Supports Changes to RDIS for INF-R3,
- 17.6. Minor Upgrading to be Permitted under INF-R2,
- 17.7. Green Infrastructure – Proposed Change to INF-P1,
- 17.8. Requirement in INF-P4(3) for Renewable Energy Sources to be Low Emissions,
- 17.9. Larger Realignment Distance in INF-S2,
- 17.10. Counter-Factual Assessment in INF-S16,
- 17.11. Use of NPS-I 2025 Definition for 'Additional Infrastructure' and Reference to Three Waters in INFSD-O1 and O2, and
- 17.12. Protecting Extensions to Existing Infrastructure (INFSD-03).
- 18. In relation to the Three Waters Chapter, I address:
 - 18.1. New Objective to Protect the Waiwhetū Aquifer is Within Council's Functions, and
 - 18.2. Updating References to Regional Standard for Water Services.
- 19. In preparing this evidence, I have considered the following:
 - 19.1. National Policy Statement for Infrastructure 2025,
 - 19.2. National Policy Statement on Urban Development 2020,
 - 19.3. Proposed Lower Hutt District Plan,
 - 19.4. Section 32 Evaluation Infrastructure,
 - 19.5. Section 32 Evaluation Three Waters,
 - 19.6. Section 32 Evaluation Electricity Generation,
 - 19.7. Section 42A Officer's Report, Infrastructure and Protection of Infrastructure, and
 - 19.8. Section 42A Officer's Report, Three Waters.

Infrastructure Chapter

Recognition of Reverse Sensitivity Effects: Proposed New Objective INF-OX and PINF-O1

- 20. The Officer has rejected Tiaki Wai's submission point 422.2 that a new objective INF-OX should be added to protect infrastructure from effects of third-party activities, particularly reverse sensitivity effects:

The function and operation of infrastructure is protected from the adverse effects, including reverse sensitivity effects, of subdivision, use and development.

21. The Officer's reasoning is that PINF-O1 provides adequate protection of infrastructure. Regarding PINF-O1, the Officer has proposed the following amendments:

PINF-O1 Adverse effects on regionally significant infrastructure and other infrastructure

~~*The adverse effects of subdivision, use, and development do not compromise the operation and development of infrastructure.*~~

The safety, maintenance, operation, upgrade or development of infrastructure and regionally significant infrastructure is not compromised by incompatible subdivision, land use or development.

22. Specifically, the Officer has rejected referring specifically to reverse sensitivity effects in PINF-O1 as they consider that the reference to 'incompatible' uses is sufficient.
23. I agree that it is appropriate for this objective to not only recognise the function and operation of infrastructure as a broader range of activities associated with operating lifeline three waters utilities may result in reverse sensitivity effects.
24. I consider that there is distinct benefit in referring to reverse sensitivity effects in PINF-O1. As a result, if the Panel is inclined to reject proposed New Objective INF-OX on the basis that PINF-O1 adequately addresses the issue, I therefore recommend that PINF-O1 is updated to specifically refer to reverse sensitivity effects. This is because:
- 24.1. Reverse sensitivity effects are a more objective, well-understood type of effect with accompanying best practice and case law. The reference to incompatibility introduces an element of subjectivity that I consider could create uncertainty for plan users and decision makers. Further, I do not consider that this would adequately protect the lifeline utilities that Tiaki Wai owns, develops and operates.
- 24.2. Reverse sensitivity effects could occur notwithstanding whether the subdivision land use or development is incompatible in nature. For example, an outdoor go cart racing track may not be inherently incompatible with using land for a wastewater treatment plant, specific industrial land uses may cause reverse sensitivity effects.

Recognition of Three Waters Infrastructure in INF-P1

25. Tiaki Wai sought in its submission that INF-P1 be amended to better recognise that three waters infrastructure does not just *enhance* quality of life but rather is necessary to *maintain* quality of life.
26. The Officer has recognised that three waters infrastructure is required to maintain people's quality of life, however, has proposed alternative drafting to address this issue. The Officer has recommended the following drafting for INF-P1:

Recognise the social, economic, cultural and environmental benefits that infrastructure provide, including:

- 1. Enabling enhancement of the quality of life and standard of living for people and communities,*
- 2. Providing for ~~public the~~ health ~~and~~ safety and resilience of people and communities,*
- 3. Enabling businesses to function,*
- 4. Enabling growth, access and development,*
- 5. Enabling the transportation of freight, goods and people,*
- 6. Providing a lifeline during emergencies, ~~and~~*
- 7. Enabling the effective, safe, secure and efficient transmission of electricity, and*
- 8. Improving the quality of water, air or soil, and ecosystem health, resilience and indigenous biodiversity, where natural or semi-natural features or processes are incorporated into stormwater networks.*

27. I consider that the drafting that the Officer proposes does not adequately address this submission point.
28. Specifically, it is important that the policy refer to *maintaining* quality of life and not simply 'enhancement', 'access' or 'resilience'. This is because without adequate three waters infrastructure people's quality of life will decline: they may lack safe drinking water, adequate wastewater disposal or treatment or face flooding hazards from stormwater. These are core matters of health and safety. Three waters infrastructure is required to **maintain** an appropriate standard of living for our communities. It is insufficient to say it will enhance quality of life or enables access.
29. For these reasons, I consider that it is appropriate for the word 'maintain' to be added to INF-P1 to recognise the core nature of three waters

infrastructure and the corollary that, if the core nature of such infrastructure is not recognised, there is an appreciable risk that the community's quality of life may erode. In other words, the support of the policy should not only be engaged when an enhancement to quality of life is anticipated.

Proposed Changes to INF-P9

30. KiwiRail (supported by Tiaki Wai) and Tiaki Wai both sought changes to INF-P9 to better balance the need for new or upgraded infrastructure with natural hazard risks from and to flooding. I support the Officer's drafting in subclause (2) to achieve this and considers it strikes an appropriate balance. The Officer has recommended the following drafting:

Provide for new or upgraded infrastructure in natural hazard overlays where:

- 1. There is a functional need or operational need for the infrastructure to be in that location,*
- 2. Related buildings, structures or earthworks ~~are of a scale and design that do not significantly increase natural hazard risk~~ in the High Flood Hazard Overlays and Medium Flood Hazard Overlays do not impede the conveyancing of floodwaters or cause floodwaters to be diverted to adjacent properties, and*
- 3. Increases in natural hazard risk ~~to people and property, other than activities least sensitive to natural hazards~~, in identified high natural hazard overlays are avoided.*

31. However, I consider that subclause (3) appears to contain a grammatical error that makes it difficult to understand. It does not therefore address the relief that Tiaki Wai seeks, which was to clarify that subclause (3) should not apply in High Flood Hazard Overlays. Specifically, I consider that:

Provide for new or upgraded infrastructure in natural hazard overlays where:

- 1. There is a functional need or operational need for the infrastructure to be in that location,*
- 2. Related buildings, structures or earthworks ~~are of a scale and design that do not significantly increase natural hazard risk~~ in the High Flood Hazard Overlays and Medium Flood Hazard Overlays do not impede the*

conveyancing of floodwaters or cause floodwaters to be diverted to adjacent properties, and

3. Increases in natural hazard risk to people and property in identified high natural hazard overlays (other than in High Flood Hazard Overlays) are avoided.

32. The reasons that I support allowing for new or upgraded infrastructure in natural hazard overlays are:
 - 32.1. Three waters infrastructure is linear and often situated in zones with higher natural hazards because of the natural hydrology of those areas.
 - 32.2. New infrastructure is sometimes required in high natural hazard zones, at times even being installed to decrease natural hazard risk. For instance, a new pump station or stormwater infrastructure to help mitigate flood risk.

Provision for Upgrades in Active Street Frontage Overlay INF-P14

33. Tiaki Wai sought in its submission that the functional or operational need test in INF-P14 be removed to reduce barriers to undertaking upgrade work in the Active Street Frontage Overlay. The Officer has recommended rejecting this submission.
34. The Active Street Frontage Overlay encompasses several main streets where there are drinking water, stormwater and/or waste-water mains and trunk mains.
35. Requiring upgrades to meet a functional or operational need test in these locations may mean that investment in upgrading this infrastructure is potentially deprioritised as it is not consistent with INF-P14. This is particularly problematic where upgrades are necessary to prevent future repairs and/or when upgrading would otherwise occur alongside repairs. This could potentially result in unintended disruption in the Active Street Frontage Overlay as repairs become more frequently required or elsewhere as mains must be moved.
36. As a result, I support the requirement for a functional or operational need to be removed from INF-P14 to allow for Upgrades in Active Street Frontage Overlay INF-P14. This would also be more consistent with changes sought below (at paragraph 38 onwards) to allow for minor upgrades as a permitted activity.

Tiaki Wai Supports Changes to RDIS for INF-R3

37. I support the Officer's recommendation (in paragraph 364) that non-complying status is not appropriate for INF-R3 where the standards are not met. Specifically, I support the Officer's recommended change from non-complying to restricted discretionary for INF-R3. I consider an activity status of restricted discretionary is appropriate to better align with the higher-level objectives that support infrastructure provision, maintenance and operation.

Minor Upgrading under INF-R2

38. Tiaki Wai submitted that minor upgrades with the same effects as the existing infrastructure should be provided for as a permitted activity alongside repair and maintenance. Specifically, Tiaki Wai proposed providing for this by updating the activity description of INF-R2 to include minor upgrades. Wellington Electricity also sought that a 'minor upgrades' framework be maintained. This is because often repairs or maintenance provide an appropriate opportunity for upgrades to better serve communities' infrastructure current and future needs.
39. The Officer recommended that upgrades with the same effects as a permitted maintenance or repair activities should also be permitted. Tiaki Wai supports this.
40. However, it appears that either the Officer has not proposed a change to achieve this outcome or considers that by adding INF-S3 to INF-R2 they are achieving this. I do not consider that adding an additional standard to INF-R2 enables minor upgrades with the same effects as repairs and maintenance. I therefore continue to support an amendment to the activity description of INF-R2 to reflect that minor upgrades are permitted.
41. An approach that I consider appropriate to achieve this is an amendment to the activity description in INF-R2 and the addition of a defined term for 'Maintenance and Minor Upgrades' as follows:

INF-R2 Operation, maintenance and minor upgrades, repair, and decommissioning of infrastructure

***maintenance and minor upgrade** includes work undertaken to ensure the effective and efficient operation and performance of existing infrastructure, and includes:*

(a) activities associated with the maintenance, renewal or repair of existing infrastructure, including all relevant ancillary activities; or
(b) replacement, or renewal of, existing infrastructure with the modern equivalent equipment or asset, which may not be 'like for like'; or
(c) works necessary to continue to deliver the same or similar level of infrastructure services or to improve resilience; or
(d) other upgrades of existing infrastructure where the adverse effects are relative to those associated with the existing infrastructure.

42. The defined term of 'Maintenance and Minor Upgrades' that I propose is the same definition used in the NPS-I 2025. I consider this appropriate because it enables small-scale upgrades (such as a minor upgrade in pipe diameter) where the effects are similar to those of repairs or maintenance. This definition also aligns the PDP with higher order instruments, specifically Policy 8 of the NPS-I which requires decision-makers to enable the efficient operation and maintenance and minor upgrade of existing infrastructure.

Green Infrastructure – Proposed Change to INF-P1

43. Greater Wellington Regional Council sought several changes to provide for green infrastructure, many of which the Officer recommended rejecting in favour of a change to INF-P1 instead.
44. I support the Officer's recommendation and drafting to provide for green infrastructure in INF-P1. This is because green infrastructure can be appropriate in managing stormwater and it is appropriate to recognise it in the infrastructure chapter where it forms part of the stormwater network. However, not all green infrastructure forms part of the stormwater network and, in some instances, solutions other than green infrastructure are required or are more appropriate.
45. I support Officer's recommended changes as they strike an appropriate balance in recognising green infrastructure that is part of the stormwater network.

Requirement in INF-P4(3) for Renewable Energy Sources to be Low Emissions

46. Clarus sought a change to INF-P4(3) to broaden the references to transition to renewable electricity to extend to 'other renewable energy sources'.
47. The Officer has recommend partially accepting this submission by amending INF-P4(3) as follows:

INF-P4 Technological advances

Provide flexibility to adopt new technologies for infrastructure that: ...

3. Facilitate a transition to renewable electricity and other renewable energy sources, or ...

48. I acknowledge that the changes made by the Officer seek to address Clarus' submission point, while supporting the Council's efforts to reduce emissions (such as those in the Regional Emissions Reduction Plan Te Mahere ā-Rohe Whakaheke Tukunga 2024–2030). However, I consider that additional requirement that the renewable energy source be low emissions may exclude energy sources that are renewable and would otherwise go to waste or be released to the atmosphere but that may not be low emissions. Examples of such sources include biosolids or landfill gas capture.
49. For this reason, I support the following alternative drafting:

INF-P4 Technological advances

Provide flexibility to adopt new technologies for infrastructure that:...

3. Facilitate a transition to renewable electricity and other energy sources which are renewable and either have low emissions; or are produced by a source of waste...

50. I consider that this drafting would appropriately balance the Officer's focus on low-emissions with alternative technologies.

Larger Realignment Distance in INF-S2

51. Wellington Electricity, supported by Tiaki Wai, sought that clause 1 of INF-S2 be replaced with the following to increase the realignment distance for pipes from 5 metres to 10 metres:

1. The replacement, realignment or relocation of a line, any pipe (excluding a gas transmission pipeline), support structure, conductor, cross arm, switch, transformer or ancillary structure must be within 10 metres of the existing alignment or location

52. The Officer has recommended that this submission point be rejected.
53. In my view, the additional flexibility of 10 metres compared to 5 metres is unlikely to significantly increase adverse environmental effects, where there

are other controls on effects, such as the earthwork's standards. I am also cognisant that requiring consent to upgrade infrastructure slightly more than 5 metres from its existing alignment introduces a risk that an important water project may not go ahead.

Counter-Factual Assessment in INF-S16

54. KiwiRail submitted that the matters of discretion for INF-S16 should be amended so that decision-makers must consider:

11. Whether there is any change to natural hazard risk and whether risks have been minimised to the extent practicable.

12. The functional need and operational need of, and benefits derived from earthworks, including the potential impact on the levels of service, operational efficiency or health and safety if the work is not undertaken.

55. The Officer has recommended rejecting this submission point because he considers that these factors are already included in other policies/objectives that the decision-makers must consider under INF-S16.
56. While I understand this reasoning, I consider that it is important to specifically highlight the matters proposed by Kiwirail for the following reasons:
- 56.1. Infrastructure often has a functional or operational need to be located in areas of natural hazard risk. In particular, three waters infrastructure often has a functional or operational need to be located near water bodies or in flood hazard areas because of natural hydrology of these areas. Additionally, as water infrastructure is both linear and required for almost all forms of development, three waters infrastructure widespread. The matters of discretion should specifically account for this.
- 56.2. Further, it is appropriate for the decision-maker to consider the actions infrastructure providers have taken to minimise natural hazard risk, notwithstanding a functional or operational need for infrastructure to be situated in a hazard area. Often infrastructure providers adopt methodology to minimise increases in hazard risk, where they cannot otherwise change the location of the infrastructure. Tiaki Wai is required to maintain a detailed understanding of the performance, vulnerabilities, and operational requirements of its assets, and assess

and respond to natural hazard risks as part of their asset management and resilience planning. Where infrastructure is required in hazard areas, Tiaki Wai implements design, operational, and mitigation measures to avoid or minimise hazard risk.

- 56.3. The counter-factual assessment included in KiwiRail's proposed subclause (12) is also important. Often, decision-makers must consider the effects of undertaking an activity but not the effects of failing to undertake an activity. With three waters infrastructure, this approach leads to providers not being permitted to undertake necessary repair or maintenance because of the adverse effects of such repair or maintenance, when not undertaking such repair or maintenance may have significantly more adverse effects should the infrastructure fail.

57. For these reasons, I support Kiwirail's submission on INF-S16 in full.

Use of NPS-I 2025 Definition for 'Additional Infrastructure' and Reference to Three Waters in INFSD-O1 and O2

58. Several submitters sought changes to INFSD-O1 and O2 to broaden these objectives to apply to different types of infrastructure.
59. In response, the Officer recommends adding the defined term 'additional infrastructure' and incorporating this within provisions that do not clearly extend to additional infrastructure.
60. I agree with the Officer's recommendation to extend these objectives. I consider that a change is needed to extend these objectives to either additional infrastructure or three waters infrastructure because I consider that the definition of infrastructure in the PDP does not adequately extend to the stormwater network. The definition of 'infrastructure' in the PDP includes the following parts relating to three waters infrastructure:

...e. a water supply distribution system, including a system for irrigation:

f. a drainage or sewerage system:...

61. Stormwater infrastructure can have wide-ranging component parts, including pipes, treatment devices, swales, overland flow paths, drainage reserves, public parks and more (see Appendix A for a high level overview of different types of three water infrastructure). Stormwater infrastructure therefore may not be sufficiently captured within the narrow wording of a 'drainage system' in the PDP definition of 'infrastructure'.

62. I broadly support either:
- 62.1. Extending INFSD-O1 and O2 to 'additional infrastructure' together with adding a defined term for 'additional infrastructure' using the drafting in the NPS-I 2025. This was the Officer's recommendation; and/or
 - 62.2. Extending INFSD-O1 and O2 to 'three waters' infrastructure specifically. I prefer this option over that in paragraph 62.1, for the reasons set out below in paragraph 63, however the option in 62.1 is preferable over retaining the provisions as notified.
63. I prefer extending these objectives to cover three waters infrastructure by maintaining the reference to three waters infrastructure in INFSD-O1 and adding a reference to three waters infrastructure in INFSD-O2. Having a specific reference to three waters infrastructure is important because it alerts plan users (including developers) of the need to engage early with Tiaki Wai on integrating their land uses with three waters infrastructure. This avoids inappropriate development that is not adequately supported by lifeline infrastructure. This approach may also smoothly translate to wider moves towards spatial planning in resource management. It is therefore appropriate to specifically refer to three waters infrastructure in INFSD-O1 and O2.
64. Alternatively, I support the Officer's recommendation that the definition in the NPS-I 2025 be adopted rather than that in the NPS-UD. This is because the NPS-I 2025 definition clearly includes "the stormwater network". Therefore, any reference to 'infrastructure and additional infrastructure' will adequately encompass all three waters infrastructure. It is also appropriate for infrastructure related chapter to maintain consistency with higher level instruments relating to infrastructure. I therefore support adding the defined term 'additional infrastructure' as an alternative approach to specific reference to 'three waters infrastructure'.

Protecting Extensions to Existing Infrastructure (INFSD-03)

65. Clarus sought an amendment to INFSD-O3 to recognise that this objective should extend to supporting and protecting extensions of existing infrastructure and establishment of new infrastructure.
66. The Officer has recommended rejecting this submission point.
67. However, I consider that extensions of existing infrastructure should be protected and supported. Not doing so risks creating an anomaly where existing infrastructure is supported and protected, for instance a wastewater treatment plant, but extensions to that same plant would not be supported

or protected, even if they would lead to improved environmental or social outcomes. This would appear to be a perverse, unintended outcome. For this reason, I support partially adopting Clarus' submission point regarding extensions of infrastructure.

Three Waters Chapter

New Objective to Protect the Waiwhetū Aquifer is Within Council's Functions

68. In its submission, Tiaki Wai sought that a new objective be added to the Three Waters chapter to protect the Waiwhetū aquifer. This is because, as outlined above, the Waiwhetū aquifer is a key source of drinking water for the region and protecting it is protecting the health, safety and wellbeing of the greater Wellington region, including Hutt City. Specifically, Tiaki Wai sought the following objective be added:

Protect the Waiwhetū aquifer from the adverse effects of urban development and adverse effects of existing infrastructure.

69. The Officer has recommended rejecting the new proposed Objective because, in their view, regulating water takes is a Regional Council function and the City Council does not have functions relevant to protecting the Waiwhetū aquifer.
70. While regulating water takes and discharges is a Regional Council function, activities and land uses within the scope of the City Council's functions can impact the Waiwhetū aquifer. For instance, industrial or rural land uses may contaminate the water supply through chemical or biological seepage. There are industrial zones overlaying the aquifer in the PDP. Regulating such land uses is squarely within the City Council's functions.
71. Further, the Council has indicated the importance of the aquifer through its introductory wording to the Three Waters chapter. I am of the view that if there is not a discharge consent required in relation to a proposed activity, but a risk exists in relation to source water contamination, district plan provisions should include provisions to ensure the potential effects on source water can be addressed appropriately by a decision maker.
72. As a result, I consider that a new objective is appropriate and important to provide for the health, wellbeing and safety of people in the greater Wellington region.

Updating References to Regional Standard for Water Services

73. The Officer has supported the submission by Tiaki Wai to update references to the Regional Standard for Water Services (Regional Standard) from Version 3.0 to Version 3.1. This is because it ensures that the PDP is up-to-date with the latest standard. Further, the Officer has referred to the “Regional Standard”, rather than Wellington Water or Tiaki Wai Regional Standard for flexibility regarding Wellington Water’s transition to Tiaki Wai.
74. I support this pragmatic approach and note that it is technically correct as the standard name does not refer to either Wellington Water or Tiaki Wai. In due course, there may be a version 4.0 of the Regional Standard but that this is simply an update to branding and does not include substantive changes, I anticipate that this can be corrected through clause 16 of Schedule 1 if required.
75. Further, I support the Officer’s recommendation to reject Kāinga Ora’s submission to remove reference to the Regional Standard (386.3) in THW-P1. Tiaki Wai similarly opposed this submission point (F36.392). This is because reference to the Regional Standard is an important regulatory tool to ensure the safety and quality of three waters, connecting to Tiaki Wai’s network.

Timothy Michael Blackman

7 September 2026

Appendix A: Description of Three Waters Infrastructure and Services

Three waters infrastructure broadly refers to infrastructure that relates to:

- Drinking water
- Wastewater
- Stormwater

Activities that Tiaki Wai undertakes relating to drinking water include abstracting drinking water from source, treating drinking water, storing drinking water (eg. In reservoirs), quality assurance and monitoring and providing access to drinking water for residential and commercial consumers. Tiaki Wai also repairs, upgrades and maintains the drinking water network and helps expand the network. The network of drinking water infrastructure includes pipes, pumps, reservoirs, treatment plants, bores and more.

Activities that Tiaki Wai undertakes relating to wastewater include transporting wastewater from source to treatment plants, treating wastewater and disposing of it and its by-products (eg. sludge), quality assurance and monitoring. Tiaki Wai also repairs, upgrades and maintains the wastewater network and helps expand the network. The network of wastewater infrastructure includes pipes, pumps, treatment plants, outfalls and more.

Activities that Tiaki Wai undertakes relating to stormwater include transporting, treating and disposing of stormwater and quality assurance and monitoring. Tiaki Wai also repairs, upgrades and maintains the stormwater network and helps expand the network. The network of stormwater infrastructure is varied and broad, incorporating both the natural and built environment. It includes inlets, outlets, pipes, treatment devices, soakage or seepage pits, rain gardens, overland flow paths, reserves and parks, natural waterbodies and more.