Proposed Natural Resources Plan:

Submitter:

Joe Hintz

Submitter Number:

S401

#1531159

5401

Wellington Regional Council

3 0 OCT 2015

SUBMISSION on the proposed Natural Resources Plan for the Wellington Region

To: regionalplan@gw.govt.nz OR Freepost 3156, GWRC, PO Box 11646, Wellington 6142

Email Address	
Phone Number	063727746
Physical Address	518 Te kopi Rd R.D4 Mstn
Farm Name	Wainviory Station L+0
Name	Joe Hintz

Communication from GWRC: I prefer email OR hardmail - choose one

Trade competition: I could not gain an advantage in trade competition through the submission

Hearing: I wish to be heard and would consider jointly appearing with other submitters

Support: I support Wairarapa Federated Farmers submission

INTRODUCTION - Key Points about farm/business

e.g. Sheep, Beef , Arable, Dairy, agricultural business		
1017 hectares		
Yes No		
e.g. if you like the partnership approach with council staff on the ground, say		
so		

STOCK EXCLUSION

Specific Provisions that my submission relates to are:

Definition of Category Two waterbodies, including water races and drains > 1 metre

Schedule I and Map 22: important trout spawning habitat

Rule 97: access to the beds of surface waterbodies by livestock

- Stock exclusion from Category One waterbodies by July 2018
- Stock exclusion from Category Two waterbodies by July 2022
- Stock access to Category Three waterbodies permitted subject to conditions, e.g. crossings

My submission is: support/oppose

I seek the following changes:

Extend the timeframes, e.g. Category One by 2020, Category Two by 2025

Exclude sheep from Category One

Exclude water races and drains from Category Two

Delete requirement for dairy cow exclusion from hill country rivers > 1 metre

Specify that stock exclusion from spawning sites – inanga or trout – is during the spawning season.

Specify criteria for "important" trout spawning rivers; delete those that don't meet the criteria

Amend the definitions of stock crossing to match hill country practicalities and effects

Allow for stock drinking points

Ensure that alternative stock water supplies are available and rules don't apply until they are.

Stock Exclusion Comments and Reasons

Specific to your farm, e.g. discussion on costs, practicalities, stock water; attach/include photos For Category One sites, would it be reasonable to exclude sheep where there is agreement between landowner, council and iwi as part of Council funded management plan?

WETLANDS

Specific Provisions that my submission relates to are:

Interpretation: definition of natural wetland and significant natural wetlands

Schedule F3: significant wetlands

Rule 105: Planting in wetlands - approved native plants only

Rule 106: Restoration of natural or significant wetlands - controlled if Wetland Management Plan

Rule 107: Activities in natural or significant wetlands - discretionary

Rule 108: Activities in wetlands - non-complying, including diversion of water into a natural wetland

My submission is: support/oppose

I seek the following changes:

Natural wetlands: Natural wetlands: amend to exclude intermittent and ephemeral water bodies, and clarify these do not include hill country seeps or paddocks subject to regular ponding, dominated by cultivated pasture, whether or not associated with sedge, raupo or rush species.

Significant wetlands: re-prioritise to focus efforts on the highest value sites; change minimum size from 0.1ha to 1.0ha

Rule 104: allow use of machines rather than just hand held

Rule 105: allow for planting introduced species for bees or ducks

Rule 106, 107: amend to provide for restoration or enhancement of wetlands to be a permitted activity, with plans prepared as a non-regulatory partnership.

Rule 108: Allow diversion of water as part of a restoration plan

Wetlands Comments and Reasons

e.g. If you have been advised of a significant wetland on your farm – and you question it – state the name of the wetland and your reasoning (size, condition, man-made, etc)
Mention if you have an interest in constructing or extending wetlands.

FARM EFFLUENT

Specific Provisions that my submission relates to are:

Rule 83: Discharge of collected animal effluent to land - controlled

Rule 93: effluent to land in supply protection area – discretionary

Map 27: groundwater community drinking water supply protection areas

My submission is: support/oppose

I seek the following changes:

Effluent Comment and Reasons

Undertake more rigorous regional cost-benefit analysis of pond storage and sealing requirements prior to the hearing to support proper consideration by the Hearing Commissioners.

Provide reasonable timeframes and a stepped approach for the installation of storage (e.g. 3-5 years)

Clarify the definition of ponding; and exclude extreme weather events, breakdowns occurring out of manager's control, be consistent with urban conditions.

In groundwater protection areas, undertake a risk analysis prior to the hearing to support appropriate conditions being established in a controlled rule, rather than discretionary.

Extend the consent timeframe to 20 years to reflect the investment made

e.g. are they over-estimating the risks and under-estimating the costs? If you already have ponds, is it reasonable to up the ante on storage and sealing?	

SILAGE

Specific Provisions that my submission relates to are:

Definition: a fermented high moisture stored fodder

Rule R90: manufacture and storage of silage and compost, including

- Condition a) the manufacture and storage area shall not be located within 20m of a surface water body (stream, drain, water race and intermittently flowing streams)
- Condition d) the walls and floor of a silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water

My submission is: support/oppose

I seek the following changes:

Delete the requirement for impermeable lining; retain the condition that there be no discharge to water

Delete the requirement for location not allowed within 20m of a surface water body (not needed due to no discharge condition above)

Change the definition to specify this does not include baleage

Silage Comments and Reasons e.g. low risk from wilted silage; costs for impermeable lining – estimate the costs if you can Cost Benefit analysis has not included any clear evidence of the benefits outweighing the costs. Difficulty in dealing with surplus years – filled up the main stack but still have extra. This rule will make us turn to baleage that is twice as expensive and has the plastic disposal issues.

CULTIVATION & BREAKFEEDING

Specific Provisions that my submission relates to are:

Rule 94: Cultivation & Rule 95: Break feeding

 Cultivation/ break feeding shall not occur within 5m of a surface waterbody, including open drains and water races

My submission is: support/oppose

I seek the following changes:

Delete the conditions requiring 5m setbacks

	Cultivation/Breakfeeding Comments and Reasons e.g. costs, practicalities, timing, lay of the land
	Add a statement in about what you normally do when cultivating or breakfeeding

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DRAIN CLEANING

Specific Provisions that my submission relates to are:

Definition of highly modified watercourse:

Modified and channeled to the extent it has the characteristics of a drain, including that: the channel is a single flow, straight, no curves, mechanically formed with straight or steep banks, maintained to keep the watertable at least 0.3m below the pasture root zone, and it exhibits these characteristics for the entire length of the property

Rule 121: Maintenance of drains and highly modified streams; and

Rule 122: Removing vegetation from the bed of any river; same conditions for both

- any fish shall be returned no later than one hour
- only one side shall be cleared at any one time, and the other side three months later; or, only the middle shall be cleared, leaving no less than 0.3m each side
 - for drains and highly modified streams, this condition applies from July 2017

Method M14: Maintenance of drains

 GWRC will develop an education programme in collaboration with industry and other stakeholders to support implementation of Rule 121

My submission is: support/oppose

I seek the following changes:

Change the definition of highly modified stream to include all streams that have been modified by human activity – straightening, deepening, channeling.

Provide high resolution maps in the plan, clearly showing drains and highly modified streams that are covered by Rule 121. This is required before the hearing to see the scale of the issue.

Provide direction to landowners about the type of waterways on their land.

Fast-forward Method 14 to develop agreed good practice for drain cleaning to inform the Hearing Commissioners consideration of the proposed rules.

Extend the timeframe for the implementation of the new conditions from 2017 to 2020

Drain Cleaning Comments and Reasons e.g. costs, practicalities, historical modification not recognized		

EARTHWORKS

Specific Provisions that my submission relates to are:

Definition of earthworks

Rule R99: earthworks of a contiguous area up to 3000m2 per property per 12 months - permitted

Rule 101: earthworks that doesn't meet permitted conditions - discretionary

My submission is: support/oppose

I seek the following changes:

Amend the definition and Rule 99 to allow construction of farm tracks as a permitted activity, as well as maintenance.

Change Rule 101 to controlled or restricted discretionary with clear conditions

Earthworks comments and reasons	
e.g. operational and farm safety aspects Note the word "contiguous' is important in thinking about impact	
Trote the word contiguous is important in thinking about impact	

VEGETATION CLEARANCE on Erosion-Prone Land

Specific Provisions that my submission relates to are:

Definition of erosion-prone: slope >20 degrees

Definition of vegetation clearance: clearance of woody vegetation (exotic or native) by mechanical or chemical means including felling, spraying by hand or aerial means, hand clearance and burning

Rule R100: vegetation clearance on erosion-prone land

contiguous area up to 2ha per property per 12 months
 – permitted

Rule 101: vegetation clearance that doesn't meet permitted conditions - discretionary

My submission is: support/oppose

I seek the following changes:

Change definition of erosion prone to increase the slope, and exclude stable substrate, e.g. greywacke

Change definition of vegetation clearance to exclude hand clearance, hand or aerial spraying and roller crushing

Change Rule 101 to controlled or restricted discretionary with clear conditions

Vegetation Clearance comments and reasons e.g. confusion with different slope triggers.	
Add a statement in about what you normally do, e.g. leave an area unsprayed Note the word "contiguous' is important in thinking about impact	

CULVERTS & BRIDGES

Specific Provisions that my submission relates to are:

Rule R114: weirs, fords, small bridges - permitted if

- not >20m2 in size / footprint
- catchment not >50ha west of the Ruamahanga, 200ha east of the Ruamahanga

Rule R115: culverts - permitted if

not >20m length and not >0.3m-1.2m diameter

Rule 125: small river crossings, dams, structures in a mana whenua site - restricted discretionary

My submission is: support/oppose

I seek the following changes:

Rule R114: Change the 50ha catchment restriction to 200ha (or clarify rationale for the difference)

Increase the size for fords and bridges (20m2 too small)

Rule R115: delete the condition restricting culvert diameter; retain condition that the culvert be constructed to allow for 20 year flood event.

Provide advice to landowner of appropriate culvert sizes to achieve the above condition

Mana whenua sites: undertake proper assessment of restrictions proposed for mana whenua sites within the plan itself – not leaving this to a consent process at landowner cost

Culverts/Bridges comments and reasons e.g. fords/crossings good alternative method to constructing structures especially where use is infrequent or risks of structure outweigh the impact of a ford.	
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OFFAL PITS, FARM REFUSE DUMPS

Specific Provisions that my submission relates to are:

Rule 89: Farm Refuse Dumps - 15 conditions

Rule 91: Offal Pit - 9 conditions

My submission is: support/oppose

I seek the following changes:

Rule 89: Farm Refuse Dumps

- increase size from50m3 to 100m3
- heavily prune the fourteen other conditions to focus on clear effects

Rule 91: Offal Pits

- retain condition a) re only containing dead matter from the property; and condition h) odour is not offensive beyond the boundary
- heavily prune the other seven conditions to focus on effects

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	Offal Pits/Refuse Dumps Comments and Reasons
	e.g. these are an existing activity on farms and do not cause adverse effects so do not need multiple conditions.
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AGRI-CHEMICALS

Specific Provisions that my submission relates to are:

Rule 36: Agrichemicals - permitted activity conditions relating to aerial and vehicle based spraying

- (e) no discharge within a community drinking water supply protection area
- (g) spray plan must be prepared once pa
 - identify sensitive areas (dwelling house, schools, amenity areas, non-target crops sensitive to agchem, organically certified properties, surface water bodies including natural wetlands and associated riparian vegetation, and significant and outstanding water bodies)
 - notify neighbours the spray plan is available on request
 - get written agreement from adjoining neighbours that notification is not required
 - supply a copy of the spray plan at least 24 hours prior to application, to the owner/occupier of sensitive areas or likely to be directly affected, or requests a copy

My submission is: support/oppose

I seek the following changes:

Change condition g) to more reasonably reflect practicalities and risks

In water supply protection areas, undertake a risk analysis prior to the hearing to support appropriate conditions being established in a controlled rule, rather than discretionary.

Agri-chemicals Comments and Reasons e.g. provides a level of protection that is not associated with the risk, demands undue notification requirements when neighbours might not be affected	n

FERTILISER

Specific Provisions that my submission relates to are:

Rule 82: Application of fertilizer - permitted activity, provided

Condition a) not into or onto a surface water body or beyond the boundary, including as a result of wind drift

My submission is: support/oppose

I seek the following changes:

Amend condition a) to reflect the practicalities of aerial fertiliser application

Fertiliser Application Comments and Reasons
e.g. It is impossible to miss all intermittent surface waterbodies when using a plane or helicopter. Technology is being developed to allow this but it is not commercially available. Condition a) will cause a health and safety risk to the operation of aerial fertilizer application.

STORM WATER

Specific Provisions that my submission relates to are:

Rule R48: storm water from individual property permitted, except

- the discharge is not into an outstanding waterbody (e.g. Lake Wairarapa)
- concentration of total suspended solids does not exceed specified concentrations
 - 50g 100g/m3 or 20-33% change depending on "significance" of site

My submission is: support/oppose

I seek the following changes:

Rule R48: delete condition (a): no discharge into outstanding waterbodies

Delete condition (e) specifying suspended solid concentrations, retain condition (g) requiring no conspicuous films, scum, floatables etc

Stormwater comments and reasons e.g. impracticality, costs, low risk. Would it require a consultants report to get consent?
e.g. Impracticality, costs, low risk. Would it require a consultante report to get concent.

Any other areas of concern – just copy format above

Proposed Natural Resources Plan:

Submitter:

Derek Daniell

Submitter Number:

S402



#1530577

5402

Mark Sutherland

From:

Regional Plan

Sent:

Friday, 23 October 2015 8:40 a.m.

To:

Records

Subject:

FW: Submission

Wellington Regional Council

23 OCT 2015

Kind Regards,

Erin Campbell | Hearings Officer, Environmental Policy GREATER WELLINGTON REGIONAL COUNCIL Te Pane Matua Taiao Shed 39, 2 Fryatt Quay, Pipitea, Wellington 6011 PO Box 11646, Manners St, Wellington 6142 T: 04 830 4318 | www.gw.govt.nz

----Original Message-----

From: Derek Daniell [mailto:derek@wairererams.co.nz]

Sent: Thursday, 22 October 2015 5:04 p.m.

To: Regional Plan Subject: Submission

As a landowner and farmer in the GWRC, I'd like to make a submission on the plan.

First, I support the concerns raised by Federated Farmers, which need to be debated.

Second, I have a fundamental concern that the outcome of this plan will simply be to create more jobs for bureaucrats and more cost for those trying to run profitable businesses. Farmers do not want to destroy their environment; they have a vested interest in the value of their land.

Third, I would like to see figures for the achievements of the soil conservators over the past three years....how many trees planted per conservator, and more importantly, how many surviving trees per year per conservator. What is achieved by a 23 year old recent graduate trying to tell a fifty year old bulldozer operator how to build a dam or construct a track? It's just unnecessary interference.

Fourth, New Zealand's transport infrastructure was largely constructed before the need for years of delay and cost via resource consents. Thank God for that, is all I can say. And has any of that wreaked vast damage on the environment? New Zealand exporters have enough cost barriers without having more created.

Yours faithfully Derek Daniell Sent from my iPad



Proposed Natural Resources Plan:

Submitter:

Point Howard Association Inc

Submitter Number:

S403

DRM 5: SUBMISSION FORM - PROPOSED NATURAL RESOURCES PLAN FOR THE WEL	
s'is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management of Clause 6 of Schedule 1, Resource 6 of Schedule 1	
AME/ORGANISATION 5403	#IS25390
OINT HOWARD ASSOCIATION INC	
UMBER STREET NAME	
HOWARD RD	
JBURB/TOWN	POSTCODE
T HOWARD LOWER HUTT	5013
	3 ma 1 1 . e 0/m
e Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We	<u> </u>
ocess, information and provide you with details of any meetings and the hearing. Please tick here [] if you do not agree to receive o	communication via email
ne specific provision(s) of the Proposed Natural Resources Plan that my submission relates to is:	
ease specify the provision/section number: Committees construction on this provision is:	
y submission on this provision is.	,
I support the provision I oppose the provision	productive control and the control of the control o
I wish to have the specific provision amended	Wellington Regional ிவர
easons for my submission:	2 2 SEP 2015
As per attached.	
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	National Control of the Control of t
ieek the following decision from WRC (give precise details):	
lease continue on separate sheet(s) in similar format or download a submission form from www.gw.govt.nz/regional-p	lan-review
ttendance and wish to be heard at hearing(s)	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
I/We do wish to be heard in support of my/our submission at hearings Note: This means that you wish to speak in support of your submission at the hearing(s)	
] I/We do not wish to be heard in support of my/our submission. Note: This means that you cannot speak at the hearyour right to appeal any decision made by the Wellington Regional Council to the Environment Court	aring. However, you will still retain
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	
Trade competition [Cross out this shaded section if you could not gain an advantage in trade competition through this subm I/we could not gain an advantage in trade competition through this submission [Awe-could gain an advantage in trade competition through this submission	ission]
I/we am/am not directly affected by an effect of the subject matter of my submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.	
ublication of details he Wellington Regional Council is legally required to publicly notify a summary of submissions including you ame and address will be there to enable other submitters who may wish to make a further submission to be opy of it.	our name and address. Your be able to serve you with a
ignature: Date: Date:	·
erson making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic s	ubmission

ost your submission to:

Freepost 3156 Wellington Regional Council PO Box 11646 Wellington 6142 .

Submission on Greater Wellington Regional Council Proposed Natural Resources Plan 2001-2021

on behalf of Point Howard Association Inc 11 Howard Road, Point Howard, Lower Hutt 5013 Contact Person: Roger Bolam Contact ph no 021 407 123

The Point Howard Association thanks the Greater Wellington Regional Council for this opportunity to comment on the *Proposed Natural Resources Plan*.

The Association supports the approach taken in attempting to produce an integrated plan to try to ensure that the Region's land, water and air plans are internally consistent and focussed on common objectives.

We also commend the suggested approach of using Plan Changes to bring in any changes necessary to bring in the better integration of the various Plans. To start afresh with a large number of entirely new Plans would by expensive and time-consuming.

We also support the approach taken which recognises that there will be different pressures and needs arising in different localities within the region. One plan will not necessarily fit all areas. For this reason we support the creation of the five *Whaitua* catchments and consider this approach potentially useful in attempting to ensure that there is effective local input to the Plan.

However, we would like to our submission to raise our concerns relating to the lack of information as to how these committees will be selected and the degree of delegation they will operate under.

We are not satisfied that the vague statement in 1.4 that "each whaitua committee will have a majority of members from the local community, along with regional, city/district councillors and manua whenua representatives" has sufficient detail to assure the public that these important decision-making bodies will be set up through a transparent, robust and democratic process. The members are after all, making decisions about air and water which are community assets.

If the public are going to have faith in the decision-making capabilities of these committees they will want to know more about the members on them, their capabilities and their connections with particular interest groups, what the balance between community, elected representatives and officials is. The opportunity, or perception of opportunity, for the process to be "highjacked" by particular pressure groups cannot be ignored.

The Proposed Plan should also lay down what opportunities exist for general public input will be provided for prior to decisions being finalised.



The Proposed Plan indicates that the whaitua will each develop an implementation programme which will include both regulatory provisions and non-regulatory programmes. It is unclear from the Proposed Plan whether whaitua will have delegated authority to bring in such provisions. This could mean that regulation is being introduced by unelected indivduals.

There is no undertaking in the Proposed Plan that there will be opportunity for public input into the whaitua prepared plans. If the public is to have confidence in the processes set up under the Proposed Plan, such matters should be specified from the outset.

In the absence of any clear statement on the process that the whaitua plans will pass through, we are assuming that the final sign-off on any decisions affecting our natural resources will be at a meeting of the relevant committee of the GWRC and that opportunity for input from members of the public will be provided for at that meeting.

We thank you for the opportunity to comment on the Proposed Plan.

We wish to be heard in support of our submission.

Roger Bolam President Pt Howard Association



Proposed Natural Resources Plan:

Submitter:

J.Q and P.M Donald

Submitter Number:

S404

SUBMISSION on the proposed Natural Resources Plan for the Wellington Region

To: regionalplan@gw.govt.nz OR Freepost 3156, GWRC, PO Box 11646, Wellington 6142

Name	J.Q.& P.M.Donald
Farm Name	Kowhai Flat
Physical Address	168c Hinakura Rd MARTINBOROUGH
Phone Number	063068169
Email Address	Kowhai.flat@xtra.co.nz

Communication from GWRC: I prefer email

Trade competition: I could not gain an advantage in trade competition through the submission

Hearing: I wish to be heard and would consider jointly appearing with other submitters

Support: I support Wairarapa Federated Farmers submission

INTRODUCTION - Key Points about farm/business

Farm Type	e.g. Sheep, Beef , Arable, Dairy, agricultural business
Farm size (area)	17 hectares
Main Waterways	
GW Soil plan or	No
Farm Plan	
Environmental	
investments	
QE2 or	
Retirement	
Blocks	
General	
Comments	

STOCK EXCLUSION

Specific Provisions that my submission relates to are:

Definition of Category Two waterbodies, including water races and drains > 1 metre

Rule 97: access to the beds of surface waterbodies by livestock

Stock exclusion from Category One waterbodies by July 2018

My submission is: support/oppose

Rule 97 is opposed Exclude the necessity for an A category 1 water body that does not carry permanent water and the exclusion of stock.

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OFFAL PITS, FARM REFUSE DUMPS

Specific Provisions that my submission relates to are:

Rule 89: Farm Refuse Dumps – 15 conditions

Rule 91: Offal Pit - 9 conditions

My submission is: support/oppose

We seek the following changes:

Rule 89: Farm Refuse Dumps

Rule 91: Offal Pits

Offal Pits/Refuse Dumps Comments and Reasons

Offal pits and refuse dumps have existed on farms for generations. The size of refuse dumps should be increased to 100m3 and the remaining 14 conditions heavily pruned, particularly the 20 km rule.

Offal pits should be fenced and cause no offence beyond the farm boundary

AGRI-CHEMICALS

Specific Provisions that my submission relates to are:

Rule 36: Agrichemicals - permitted activity conditions relating to aerial and vehicle based spraying

(e) no discharge within a community drinking water supply protection area

My submission is: support/oppose

I seek the following changes:

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	The costs and impracticalities of fencing category 1 and 2 water bodies will be immense. Maintaining electric fencing in the back country can be nigh impossible, due to faults, terrain, and the weather. Animals gaining access to water through fence breakdowns is bound to happen and defeat the whole issue.

Proposed Natural Resources Plan:

Submitter:

William Craig Stewart Booth and Eleanor Joan Booth

Submitter Number:

S405

Mark Sutherland

#1530017 S405

Wellington Regional Council

O 4 OOT DOAR

From:

Regional Plan

Sent:

Wednesday, 21 October 2015 3:33 p.m.

To:

Records

Subject:

FW: GWRC- Proposed Natural Resources Plan - Public Consultation - C & E Booth

Submission

Attachments:

CB & EJ Booth-SUBMISSIONFORM proposedNaturalResourcesPlan..pdf

Kind Regards,

Erin Campbell | Hearings Officer, Environmental Policy GREATER WELLINGTON REGIONAL COUNCIL *Te Pane Matua Taiao*Shed 39, 2 Fryatt Quay, Pipitea, Wellington 6011

PO Box 11646, Manners St, Wellington 6142

T: 04 830 4318 | www.gw.govt.nz

From: Eleanor Booth [mailto:grandmatoeight21@gmail.com]

Sent: Wednesday, 21 October 2015 3:00 p.m.

To: Regional Plan

Subject: GWRC- Proposed Natural Resources Plan - Public Consultation - C & E Booth Submission

GWRC,

Please find attached our submission on the Proposed Natural Resources Plan, for your review and consideration.

Our submission relates to our suggested and recommended changes to Clause 5.7 Coastal Management, Rules R196 and R198 to cover the restricted use of motor vehicles on the foreshore of the Golden Gate Peninsular, which forms a part of the Pauatahanui Arm of the Porirua Harbour, to access our home.

We would be pleased to attend a meeting with GWRC to discuss our concerns and the contents of our submission in more detail.

Regards,

Craig and Eleanor Booth

21a Seaview Road, Paremata, Porirua City.

Telephone (04) 2339 665

Eleanor's Mobile 021 02982070





Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991



To:

Freepost 3156

Wellington Regional Council

PO Box 11646 Wellington 6142 Or email:

regionalplan@gw.govt.nz

Your details						
Full name:	William Craig Ste	wart Booth & Eleanor Jo	an Booth			
Organisation name: (If applicable)						
Address for Service:	21a Seaview Roa	d, Paremata, Porirua Cit	ty.			
Telephone no's: W	/ork: -		Home:	(04) 2339665	Cell:	021 02982070
Contact person: Craig	Booth or Eleanor	Booth				- The state of the
Address and telephone r	no (if different f	rom above):	, , , , , , , , , , , , , , , , , , ,	The state of the s		
Electronic commu	nication	44111				
We will send you update:	s on the proces	erence for providing ss, information and p eive communication	orovide y	ou with details of a	osed Natural ny meetings	Resources Plan via email. and the hearing. Please
	natoeight21@gma		ria ciria			
Littali address. grandi	natuciyinz itagina	211.COTT				
Trade competition						
// I/we could not gain	an advantage	in trade competition	n through	this submission. [Go straight to	Your Submission]
I/we could gain an a			_			
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		ed by an effect of the not relate to trade co		-		-
		fected by an effect on trade co		-		at adversely affects the ion.
Your submission						
The specific provisions		sed Natural Resou	rces Pla	n that this submis	sion relates	to are:
The specific provision of the Natural Resources Plan that		My submission on this provision is: →		I support the provi	sion	
relates to is (please specify the		provision is. 🛪		l oppose the provi	sion	
section number):				I wish to have the s	specific provis	ion amended
Clause 5.7 Coastal Managen	nent	Reasons for my submission: ->	Our	understanding is that if	the Proposed Na	atural Resources Plan is adopted
5.7.13 Motor vehicles on the	foreshore		in its	current format / text, th	en the use of m	otor vehicles to access our Porirua City, would be changed
Rule R196: Motot vehicles - p activity & Rule R198: Motor v sites of significance-non com	ehicles inside		from activ	a 'Restricted discretion ty, as per Rule R196 (t	ary' activity to a) and Rule R19	'Non-complying / Prohibited' 3, as our property is adjacent to Porirua Harbour, referred to in

Schedule F2c and Schedule F4.

		, .
	I seek the following decision from WRC (give precise details):	Following our application in 2012, GWRC issued a Resource Consent, No WGN12016P (31575) - Category: Coastal Permit, on 31 May 2012, approving our appliction as a 'Restricted Discretionary Activity', allowing us to drive vehicles along the foreshore of leve Bay, between Trevor Terrace and 21a Seaview Road, to allow for periodic transportation of heavy goods, as per the conditions attached to the Resource Consent. We are currently planning to apply for a renewal of our Resource Consent prior to expiry on 31 May 2017, which, based on the Proposed Natural Resources Plan, may be more difficult to obtain approval from GWRC. As noted in our previous application, apart from the access along the foreshore, there is only a bush track via 150 + steps from Seaview Road avaliable to access our home. The limited approved access via the foreshore over the past 2 + years has been essential for the delivery of heavy goods and removal of household and garden rubbish. As we are now in our senior years, we anticipate that it will be necessary to retain the existing option of accessing our property via the foreshore. Accordingly we propose that the use of motor vehicles on the foreshore be allowed as a 'Restricted Discretionary Activity' status, as per the status quo. To ammend the wording of Rule R196 (b), as follows: 'the activity is not within a site or habitat identified in Schedule C (mana whenua), Schedule E4 (archaeological sites), Schedule F2c (birds-coastal), Schedule F5 (coastal habitats) or Schedule J (geological features), unless a Resource Consent Application is approved as a 'Restricted Discretionary Activity'. To ammend the wording of Rule R198, generally as per the additions to Rule
J. Marian and A.		R196 above.
		es Plan that this submission relates to are:
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this provision is: →	support the provision
relates to is (please specify the provision/	,	l oppose the provision
section number):		I wish to have the specific provision amended
	Reasons for my submission:	
	I seek the following decision from WRC (give precise details):	
bo epacific provinces of the Dece-	sead Natural Passuras	es Plan that this submission relates to are:
The specific provision of the Proposed	My submission on this	support the provision
Natural Resources Plan that my submission relates to is (please specify the provision/	provision is: ->	oppose the provision
section number):		wish to have the specific provision amended
	Reasons for my submission: →	
	I seek the following	
	decision from WRC (give precise details):	
***************************************	J -27	

The specific provisions of the Propo	sed Natural Resource	es Plan that this submission relates to are:
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this	I support the provision
relates to is (please specify the provision/	provision is: ->	l oppose the provision
section number):		I wish to have the specific provision amended
	Reasons for my	
	submission: ->	
	I seek the following	
	decision from WRC	
	(give precise details):	
		ease find more boxes at the bottom of this document
Attendance and wish to be he	ard at hearing(s)	
I/We do wish to be heard in suppo [Note: This means that you wish t		
I/We do not wish to be heard in su [Note: This means that you canno made by the Wellington Regional	t speak at the hearing.	However, you will still retain your right to appeal any decision
☑ If others make a similar submission	n, I will consider prese	nting a joint case with them at a hearing.
Signature: Craig Booth & Eleanor B	ooth	Date: 21 October 2015
[Person making submission or person an electronic submission]	n authorised to sign on	behalf of person making submission. NB. Not required if making
Publication of details		
Wellington Regional Council is legally r as provided on this submission form. Ye to serve you with a copy of it.	equired to notify a sum our name and address	mary of submissions, including your name and address for service are included so that a person making a further submission is able

The specific provisions of the Propo	sed Natural Resource	s Plan that this submission relates to are:			
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this provision is: →	support the provision			
relates to is (please specify the provision/		oppose the provision			
section number):		wish to have the specific provision amended			
	Reasons for my submission:				
	ŞUDITIISSIOII. 😙				
	*****	VIII.			
	I seek the following decision from WRC				
	(give precise details):				
	→	Annual 1			
The enecific provisions of the Propo	sed Natural Resource	s Plan that this submission relates to are:			
The specific provision of the Proposed	My submission on this	I support the provision			
Natural Resources Plan that my submission	provision is: ->	oppose the provision			
relates to is (please specify the provision/ section number):		I wish to have the specific provision amended			
	Reasons for my	Wish to have the specime provision affected			
	submission: ->				
	I seek the following	Lawrence - Advantage - Advanta			
	decision from WRC				
	(give precise details):				
		J			
		s Plan that this submission relates to are:			
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this provision is: →	I support the provision			
relates to is (please specify the provision/	provision is: >	I oppose the provision			
section number):		I wish to have the specific provision amended			
	Reasons for my				
	submission: ->				
	I seek the following decision from WRC				
	(give precise details):				
	→	CALLES CONTROL			
	sed Natural Resource	s Plan that this submission relates to are:			
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this	I support the provision			
relates to is (please specify the provision/	provision is: ->	oppose the provision			
section number):		I wish to have the specific provision amended			
	Reasons for my				
	submission: ->				
	I seek the following decision from WRC				
	(give precise details):				
The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:					
The specific provision of the Proposed	My submission on this	I support the provision			
Natural Resources Plan that my submission relates to is (please specify the provision/	provision is: →	oppose the provision			
section number):		I wish to have the specific provision amended			
	Reasons for my				
	submission: ->				
	Leack the following				
	I seek the following decision from WRC				
	(give precise details):				
	→	1			

Proposed Natural Resources Plan:

Submitter:

Alison Turner

Submitter Number:

S406

FORIVI 5: SUBIVITSSION FORIVI — PROPOSED INATURAL RESOURCES PLAN FOR THE WELLINGTON REGION This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991	
CIOC #1529471	
NAME/ORGANISATION TURNER RICESOW	
NUMBER STREET NAME	
HID COLOGNE STREET IIIIIII	
	(
SUBURB/TOWN POSTCODE	
MARTINBOROUGH 5711	
PHONE EMAIL	
063069878	
The Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We will send you updates on the process, information and provide you with details of any meetings and the hearing. Please tick here 🗆 if you do not agree to receive communication via email	
The specific provision(s) of the Proposed Natural Resources Plan that my submission relates to is: Please specify the provision/section number: Wellington Regional Council	
My submission on this provision is: The provision 19007 2015	
☐ I oppose the provision ☐ I wish to have the specific provision amended	
Reasons for my submission:	_
I seek the following decision from WRC (give precise details):	
Attendance and wish to be heard at hearing(s)	
I/We do wish to be heard in support of my/our submission at hearings Note: This means that you wish to speak in support of your submission at the hearing(s)	
I/We do not wish to be heard in support of my/our submission. Note: This means that you cannot speak at the hearing. However, you will still retain your right to appeal any decision made by the Wellington Regional Council to the Environment Court	
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	
Trade competition [Cross out this shaded section if you could not gain an advantage in trade competition through this submission] I/we could not gain an advantage in trade competition through this submission I/we could gain an advantage in trade competition through this submission I/we am/am not directly affected by an effect of the subject matter of my submission that: (a) adversely affects the environment; and	
(b) does not relate to trade competition or the effects of trade competition.	
Publication of details The Wellington Regional Council is legally required to publicly notify a summary of submissions including your name and address. Your name and address will be there to enable other submitters who may wish to make a further submission to be able to serve you with a copy of it.	r
Signature: Date:	
Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission	
Post your submission to: Freepost 3156	(

Wellington Regional Council PO Box 11646 Wellington 6142

Proposed Natural Resources Plan for the Wellington Region

Pursuant to Clause 5 of the First Schedule of the Resource Management Act 1991, Wellington Regional Council gives public notice that it has prepared a Proposed Natural Resources Plan for the Wellington Region.

The purpose of the Proposed Natural Resources Plan for the Wellington Region is to identify outcomes for the management of natural and physical resources and to put in place processes and methods (including rules) to achieve the purpose of the Resource Management Act 1991. The Proposed Natural Resources Plan for the Wellington Region is a combined Regional and Coastal Plan and once operative will replace the existing Regional Plans (Regional Coastal Plan, Regional Air Quality Management Plan, Regional Freshwater Plan, Regional Plan for Discharges to Land and Regional Soil Plan).

All rules within the Proposed Natural Resources Plan for the Wellington Region have immediate legal effect.

A copy of the Proposed Natural Resources Plan for the Wellington Region and the Section 32 Reports are available for public inspection during normal working hours at:

- The offices of the Wellington Regional Council at:
 - Shed 39, 2 Fryatt Quay, Pipitea, Wellington 6011
 - 34 Chapel Street, Masterton 5810
- The head offices of the District/City Councils in the Wellington Region
- All public libraries in the Wellington Region
- The Wellington Regional Council website http://www.gw.govt. nz/Regional-plan-review/

A copy of the Proposed Natural Resources Plan for the Wellington Region and the Section 32 Reports can be downloaded from the Wellington Regional Council website or a USB can be obtained free of charge by contacting the Hearings Officer on 04 384 5708 / 0800 496 734 or by emailing Regionalplan@gw.govt.nz. Paper copies of the Proposed Natural Resources Plan for the Wellington Region and the Section 32 Reports are available for purchase from the offices of the Wellington Regional Council at the above addresses.

Please contact the Hearings Officer on 04 384 5708 / 0800 496 734 or Regionalplan@gw.govt.nz if you have any questions about the Proposed Natural Resources Plan for the Wellington Region.

SUBMISSIONS

The following persons can make a submission on the Proposed Natural Resources Plan for the Wellington Region:

- The local authority in its own area may make a submission; and
- Any other person may make a submission, but if the person could gain an advantage in trade competition through the submission, then the person may do so only if the person is directly affected by an effect of the proposal that -
 - · adversely affects the environment; and
 - does not relate to trade competition or the effects of trade competition.

You may make a submission by sending a written or electronic

submission to the Wellington Regional Council at:
Email submissions to: Regionalplan@gw.govt.nz or post to:
Freepost 3156
The Proposed Natural Resources Plan
The Wellington Regional Council
PO Box 11646, Manners St
Wellington 6142

The submission must be on the official form 5 and must state whether or not you wish to be heard on your submission. Copies of this form are available from:

- Offices of the Wellington Regional Council
- The Wellington Regional Council website http://www.gw.govt. nz/Regional-plan-review/
- Calling 0800 496 734 or by emailing Regionalplan@gw.govt.nz.

THE CLOSING DATE FOR SUBMISSIONS IS 5PM FRIDAY 25 SEPTEMBER

The process for public participation in consideration of the Proposed Natural Resources Plan for the Wellington Region is as follows:

- After the closing of submissions, the Wellington Regional Council
 must prepare a summary of decisions requested by submitters
 and give public notice of the availability of this summary and
 where the summary of submissions can be inspected; and
- There must be an opportunity for the following persons to make a further submission in support of, or in opposition to, the submissions already made:
 - Any person representing a relevant aspect of the public interest:
 - Any person who has an interest in the proposal greater than the general public has;
 - The local authority itself; and
- If a person making a submission asks to be heard in support of his or her submission, a hearing must be held; and
- The Wellington Regional Council must give its decision on the provisions and matters raised in the submissions (including its reasons for accepting or rejecting submissions) and give public notice of that decision within 2 years of notifying the Proposed Natural Resources Plan for the Wellington Region and serve it on every person who made a submission at the same time; and
- Any person who has made a submission has the right to appeal against the decision on the Proposed Natural Resources Plan for the Wellington Region to the Environment Court if:
 - In relation to a provision or matter that is the subject of the appeal, the person referred to the provision or matter in the person's submission on the proposal, and
 - The appeal does not seek the withdrawal of the proposal as a whole.

Greg Campbell CHIEF EXECUTIVE

31 July 2015

The address for service of the Wellington Regional Council is the same as the address for submissions as set out above.

Proposed Natural Resources Plan:

Submitter:

Kurt Simmonds

Submitter Number:

S407

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON REGIONAL COUNCIL To Pane Matus Taiao

To:

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Freepost 3156 Wellington Regional Council PO Box 11646

Wellington 6142

GSS-complete shaked Residence to the Com-

Your details				ZIÚCT	201
Full name: Leo Volleb				STORES	
Organisation name (if applicable):	Wairarapa \	Water User's Inc. So	ciety	4.	10
	Vollebregt				-
235	Pahautea Road	d, RD1,		94 Milesansaman (1974 a manin an 1944), 1944 (1944 - 1944 - 1944) and 1949 (1994 - 1946 - 1946)	
Fea	therston			7 A P 10 10 10 10 10 10 10 10 10 10 10 10 10	
Telephone no's: Work: 063	<u> 8088405</u> н	ome: <u>063088405</u>	Cell:	0272588405	
Contact person: Leo	Vollebregt				
Address and telephone no (if different		and a short who and a row should be an and the first state of the same and the same	****		
Electronic communication Vellington Regional Council has a pre Ve will send you updates on the proceive of	ess, information and pre- communication via ema	ovide you with details of any i	meetings a	nd the hearing, Please tick	
Trade competition			·····		
 I/we could not gain an advantag go straight to Your submission? I/we could gain an advantage in If you could gain an advantage p 	trade competition throu	ugh this submission	ticked this bo	x, delete the rest of this section and	
□l/we are directly affec	led by an effect of the	subject matter of my submiss petition or the effects of trade			
		the subject matter of my sub pelition or the effects of trade			
Your submission					
The specific provisions of the Properties continue on separate sheet(s) - and www.gw.govt.nz/regional-plan-review					
The specific provision of the Proposed	My submission on this	☐ I support the provisio			
Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	provision is: ->	☐ I oppose the provision☐ I wish to have the spec		on amended	
secion number).	Reasons for my submission: : ->	our submission is	s attach	ed to this details for	n
	I seek the following decision from WRC		THE IMPLICATION		

	Atte	ndance	and wish to be heard at hea	aring(s)		
(yes		wish to be heard in support of the bis means that you wish to speak	of my/our submission k in support of your submission at the hearing(s).]		
		[Note: T	not wish to be heard in supphis means that you cannot speak on Regional Council to the Envi	at the hearing. However, you will still retain your	r right to a	uppeal any decision made by the
		If others	s make a similar submission, l	I will consider presenting a joint case with the	m at a he	earing.
	Sign	ature:	[Person making submission or on behalf of person making sub electronic submission]	person authorised to sign bmission. NB. Not required if making an	Date:	20/10/2015

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

Leo Vollebregt

CLO

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

₹

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George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
Category A groundwat er Gategory B groundwat er (directly connected) Category B groundwat er (not directly connected) Category C groundwat er	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water frough applying the tests in Schedule Q (efficient use). Category B groundwater (not directly connected) is through applying the tests in Schedule Q (efficient use). Category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7, and chapter 8 and 7 2.2-7.9 in chapter 7, and chapter 8 and 7.2-7.9 in chapter 7, and chapter 8 and 7.2-7.9 in chapter 7, and chapter 8 and 8	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category aquifer a particular abstraction may be tapping. Since any conditions must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily niver levels and quantifiable difference between Category A & B. at present the management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Wailhenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers working by the river reported no adverse	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
tegionally ignificant nfrastructure*	stormwater networks, systems and wastewater treatment plants	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Inused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework."
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	esoddo	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

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able 3.6 roundwater	improved over time to meet that objective. Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or	amend	Unrealistic and non defined The actual numerical amount needs to be	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
irectly connected	on aquatic plants, invertebrate or fish communities in connected surface water bodies		stated	
Objective O52	The efficiency of allocation and use of water is improved and maximised through time, including by means of:	amend	Increasing water allocation allows for growth.	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of:
	(a) efficient infrastructure, and		(a) to (e) are good means to the objective.	(a) to (e) are good means to the objective.
	(b) good management practice, including irrigation, domestic municipal and industry practices, and		There needs to be the possibility of storage in stream	Add <u>(f) enabling storage within the bed of a river</u>
	(c) maximising reuse, recovery and recycling of water and contaminants, and			
	(d) enabling water to be transferred between users, and	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
	(e) enabling water storage outside river beds.			
Solicy P6: Synchronised Sxpiry and review	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if:	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years	Retain Add (c) <u>consents will run for a period of 25 years</u>
lafes	(a) the affected resource is fully allocated or over-allocated, or		Due to the significant investment in infrastructure a long consent is necessary.	

	g Add diffuse contaminants to (b)	retain	retain				
	(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	We are pleased to see irrigation get a special mention.					
	Amend	support	support				
(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.	(b) treatment, dilution and disposal of wastewater and stormwater, and	(h) irrigation and stock water, and	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	(c) there are significant social and economic benefits for the region, and	(d) water remains available formultiple in-stream and out of stream uses concurrently, and	(e) the reliability of water supply improves as a result, and	(f) the damming and storage of water contributes to the
	Policy P7: Uses of and and water (b) and (h)		Policy P11: Instream water				

		efficient allocation and use of water.			
olicy P107: ramework for sking and using rater	The framework recognises: (a) (b) (c)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and (b) the take and use of water does not exceed allocation amounts provided for in the Plan, and (c) minimum flows or water levels are managed in accordance with the Plan	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence lnsert (d) when schedule P changes; -ve effect on consent holders — 10 year lead in time to reflect cost. +ve effect - the water availability should be released immediately."
Policy P109: Lapse tates affecting vater takes	Resource consengiven effect to wit commencement cjustified due to the activity. For the pleffect to" includes water meter or flo of the water in acresource consent	provisions. It to take and use water sha hin three years of the late unless a longer lapse dus scale or complexity of the urpose of this policy, "given the installation of infrastruc w measuring device or the cordance with the purpose c	support	We support the use of water	
olicy P111: Water akes at minimum	The take and us flows or water le water levels in	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

above minimum flows following a period of 10 days of continuous river levels at minimum flow	<u>As above</u>	Delete (c) (i)	
takes below minimum flows and take levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep roofstock alive during prolonged low water levels	
	Amend	əsoddo	
11), with the exception that water is available below minimum flows: (c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water wels	Policy P115: Suthorising takes Selow minimum lows and lake evels	(a) aira (b).	

	Retain	retain		(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan-being-made-operative renewal of consent the most the prices.	יס וופנו וופ סוופן א	
				The investment in infrastructure is considerable and time is required to implement changes		
	Support	support		amend		
	Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to	meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of:	(a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents	have a period of four years from the date of the plan being made
	olicy P116: ;eallocating water	Policy P117: Supplementary allocation amounts	at flows above the nedian flow	Policy P118: Reasonable and sflicient use		

	operative to meet the criteria, and		
nused water	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of: (a) a capital expenditure programme linked to the purpose water is used for, and purpose water is used for, and efficient use criteria identified in Schedule Q (efficient use).	Support	Retain
olicy P120: Faking water for itorage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	Retain
olicy P128: Fransfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use of transferred water are the same or less, and	Support	retain

	(q)	the transfer occurs within the same catchment management unit, and			
	(0)	the same or a lesser amount of water is being taken or used, and			
	(p)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(e)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
<u>Rules</u>					
Rule R135: Seneral rule for aking, use, lamming and liverting water liscretionary activity	The damming cotherwise control the Resource Nepermitted, control discretionary, nepermity is a disc	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137: Farm tairy washdown	The take and u body (other the Rule R138) or g	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

(b) delete words after " property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa y io	and cooling water may be taken in addition to water taken unde Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	vater permit amend Rule 143 (temporary water permit belete Controlled and make this rule a <u>permitted</u> activity activity bermitted activity not controlled	vater permit support retain somet for a period iscretionary ons are met:
farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met: (b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:
id milk-cooling ater – permitted tivity		Rule R143: Temporary water Sermit transfers – controlled activity	R144: Transferring water sermits – restricted liscretionary ctivity

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lethod M13: Vairarapa water aces	Wellington Regio Wairarapa distric characterise the and the social, he Wairarapa water options for the wi management opt to:	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and <u>economic values</u> of the Wairarapa water races
Method M18. Water use groups	Wellington Regional Council will: (a) support wate valuers, to manage alloc assist with wate imes of restrications of catchment is and (c) provide, was accurate tecl to assist user	support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and provide, where available, accurate technical information to assist user groups.	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	refain
Vethod M19: Water nanagement (d)	(p)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to quantify costs and benefits of water races and explore alternatives
Vethod M28: Development of good management practice guidelines.	Wellington Regic develop practice rules) in collabor organisations an	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp, the use of the words "collaboration with industry"	retain

	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
<u>Vhaitua</u> Vhaitua Volicy R.P3: Sumulative effects In river reaches of Allocating water	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects – <u>that are measured</u> on aquatic
-igures 7.3 – 7.8	Water allocation amounts	Oppose	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may chance significantly	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u> </u>	Surface and groundwater allocation amounts	Oppose	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identified

Needs empirical calculation by GVV The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	dict annual irrigation volume ccuracy of 15%." Unreasonable rarapa because of dramatic eather variations. conditions differ from the rest try. This needs to be	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed	
Oppose Needs of The control water to water to been versional Expections on the control opposent the control oppose	Amend Remove se reliably pre within an a for the Wai seasonal w Wairarapa of the coun recognised More construction.	imgato impere si more si farming need to	
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following criteria:	(a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.	
shedule P: assifying and anaging oundwater and irface water sunectivity	chedule Q: leasonable and fficient use criteria		

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by	a water user group. In other rivers, stepdomore allocations may be agreed by a water user group,	of it the absence of agreement of such a group, may be implemented by the Wellington Regional Council.	
chedule R:	tepdown Ilocations					

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

River	Winimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Wanagement point
Waipoua River	250		300	Mikimiki Bridge
Waingawa Ríver	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

John Petrie

Submitter Number:

S408



Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON
REGIONAL COUNCIL
TO Pano Matur Telao

To:

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Freepost 3156 Wellington Regional Council

PO Box 11646 Wellington 6142 AFERDALIST MARKET. Fabruar progress

Your details				2 T ÚCT 2015
Full name: Leo Vollet				**************************************
Organisation name (if applicable):	Wairarapa	Water User's I	nc. Society	4.10/
	o Vollebregt			•
235	5 Pahautea Roa	d, RD1,		
Fea	atherston			100
Telephone no's: Work: <u>06</u>	3088405 H	lome: <u>063088</u>	3405 Cell:	0272588405
Contact person: Leo	Vollebregt			
Address and telephone no (if different				
Electronic communication Wellington Regional Council has a pre We will send you updates on the proceive onere If you do not agree to receive onere of the proceive of the pr	ess, information and process, information and process.	rovide you with deta ail.	e Proposed Natural F Is of any meetings a	nd the hearing. Please tick

I/we could not gain an advantage go straight to 'Your submission'] I/we could gain an advantage in If you could gain an advantage	trade competition throplesse complete one collected by an effect of the	ough this submission of the following: subject matter of m	<i>r</i> submission that a <i>d</i>	versely affects the
□l/we are not directly environment, and does				
Your submission				**************************************
The specific provisions of the Prop Please continue on separate sheet(s) - an www.gw.govt.nz/regional-plan-review	osed Natural Resour excel spreadsheet of all o	ces Plan that this s of the proposed plan p	ubmission relates ovisions is available o	to are: nline
The specific provision of the Proposed	My submission on this	☐ I support th		
Natural Resources Plan that my submission relates to is (please specify the provision/	provision is: ->	☐ I oppose the ☐ I wish to have	e provision e the specific provisi	on amended
section number):	Reasons for my submission:>	our submi	ssion is attach	ed to this details form
	I seek the following decision from WRC		194-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	

	Atte	ndance	and wish to be heard at hearing(s)		
1	yes		o wish to be heard in support of my/our submission This means that you wish to speak in support of your submission at the hearing(s).]		
		[Note: T	o not wish to be heard in support of my/our submission This means that you cannot speak at the hearing. However, you will still retain your gron Regional Council to the Environment Court.]	right to ap	ppeal any decision made by the
		If others	s make a similar submission, I will consider presenting a joint case with ther	n at a he	aring.
	Sign	ature:	[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]	Date:	20/10/2015

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

Leo Vollebregt

CLO=

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

Ę

4

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

amend The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to Individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category aquifer a particular abstraction may be tapping. Since any conditions must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B. at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in their response to river levels. In February 2015 work undertaken in their response to river levels. In February 2015 work undertaken in their response to river levels. In February 2015 work undertaken in their response to river levels. In February 2015 work undertaken in their response to river levels.	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally	de sp
Groundwater directly connected to surface oundwate to describe and 7.9 in and 7.9 in chapter 8; and 7.9 in chapter 9. The connectivity between various groundwater from Category B coundwater from Category B coundwater and which is defined as being cundwater and which is defined as being connected by a strate over the locations generally connected by a surface water directly connected by a surface water allocation. Groundwater not classified as either category C groundwater fullectly connected by a surface water allocation. Groundwater and which is defined as being directly connected by a surface water fullectly connected by a surface water allocation. Groundwater not classified as either category C groundwater or category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in category C groundwater rot classified as either category C groundwater rot classified as either category C groundwater and which is defined as being described in Tables 7.3 and 7.4 in category B groundwater or category A groundwater or category and considered to be surface water allocation. Groundwater and which is defined as being category A groundwater not classified as either category C from the category C groundwater or category B groundwater or category C groundwater or category C groundwater or category C groundwater and which is defined as being connected) is at the locations generally described in Table 7.5 in chapter and which is defined as being connected to be groundwater or described or category A groundwater or category C groundwater or category C groundwater or category C groundwater and which is defined as being connected by a groundwater or category and considered to be groundwater or defined category C groundwater or defined category C a groundwater or defined category C a groundwater or described or defined category C a groundwater o	tegory A water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwat (not classified as either category A groundwater or category C groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally	sp. sp.
	described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,	t be provided and a strain and then a so be a clear between and hor so be a clear between and so be a clear between and the so be a clear between and the so be a clear between and the so aquifers in their eriver level adings so that liy resumed he river had servers and ano adverse

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
legionally ignificant nfrastructure*	the local authority wastewater and stormwater networks, systems and wastewater treatment plants	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Inused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	Oppose	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

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	improved objective.	wed over time to meet that tive.			
able 3.6 roundwater irectly connected surface water	Nitrate concentrations do not caus effects on groundwater-dependent on aquatic plants, invertebrate or fin connected surface water bodies	Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
Objective O52	The efficiency of all improved and maxir by means of: (a) (b) (c) (d) (e)	The efficiency of allocation and use of water is improved and maximised through time, including by means of: (a) efficient infrastructure, and including irrigation, domestic municipal and industry practices, and and recycling of water and contaminants, and contaminants, and transferred between users, and transferred between users, and inver beds.	amend	Increasing water allocation allows for growth. (a) to (e) are good means to the objective. There needs to be the possibility of storage in stream	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) enabling storage within the bed of a river
Policy P6: Synchronised expiry and review lates	Resource consents common expiry or r sub-catchment, if:	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if: (a) the affected resource is fully allocated or over-allocated, or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) <u>consents will run for a period of 25 years</u>

	(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.			
olicy P7: Uses of and and water (b) and (h)	(b) treatment, dilution and disposal of wastewater and stormwater, and	Amend	(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	Add <u>diffuse contaminants to (</u> b)
	(h) irrigation and stock water, and	support	We are pleased to see irrigation get a special mention.	retain
Solicy P11: Instream water	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	support		retain
	(c) there are significant social and economic benefits for the region, and			
	(d) water remains available for multiple in-stream and out of stream uses concurrently, and			
	(e) the reliability of water supply improves as a result, and			
	(f) the damming and storage of water contributes to the			

		efficient allocation and use of water.			
olicy P107: ramework for aking and using rater	The framework frecognises: (a) (b) (c)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and (b) the take and use of water does not exceed allocation amounts provided for in the Plan, and levels are managed in accordance with the Plan provisions.	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence lnsert (d) when schedule P changes: -ve effect on consent holders – 10 year lead in time to reflect cost, +ve effect – the water availability should be released immediately."
Solicy P109: Lapse tates affecting vater takes	Resource consent given effect to with commencement of justified due to the activity. For the pueffect to includes water meter or floof the water in accresource consent.	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	support	We support the use of water	
Policy P111: Water akes at minimum	The take and us flows or water le water levels in t	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

above minimum flows following a period of 10 days of continuous river levels at minimum flow		<u>As above</u>	Delete (c) (i)	
takes below minimum flows and take levels)(d) on restrictions	should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
		Amend	esoddo	
11), with the exception that water is available below minimum flows:	(c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water vels	☆	olicy P115: Authorising takes below minimum lows and lake evels (d) and (c) i		

Retain	retain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the-plan-being-made-operative renewal of consent to meet the criteria."
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing users replacing have a period of four years from the date of the plan being made
olicy P116: 'eallocating water	Supplementary subocation amounts at flows above the nedian flow	Policy P118: Reasonable and Afficient use

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	operative to meet the criteria, and		
olicy P119: nused water	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of:	Support	Retain
	(a) a capital expenditure programme linked to the purpose water is used for, and		
	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).		
olicy P120; faking water for storage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	Retain
olicy P128: Transfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided:	Support	retain
	(a) the adverse effects of the take and use of transferred water are the same or less, and		

(b) the transfer occurs within the same catchment management unit, and	(c) the same or a lesser amount of water is being taken or used, and	(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and	(e) the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).		The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the formation or controlled, restricted discretionary, non-complying or a prohibited and is marked.	The take and use of water from a surface water hody (other than a water race that is nemitted by
				Rules	Rule R135: Seneral rule for aking, use, samming and siverting water – siscretionary activity	3.tle R137. Farm

<u>.</u>	during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07,2015), and	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136.	In respect of condition (b) the Wellington Regional	on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	water permit Delete Controlled and make this rule a permitted activity and dynamic way mits needs to be a controlled	retain	
(b) delete words after " property." Leaving this in is anti growth and development and not in the best interests	of the Wairarapa				amend Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled	support	
farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:	(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan	(31.07.2015), and Note Water taken for farm dairy washdown and cooling	under Rule R136.	In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	
id milk-cooling ster – permitted stivity					Rule R143: Temporary water sermit transfers— Controlled activity	Rule R144: Transferring water Dermits – restricted liscretionary ctivity	Other methods

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lefflod M13: Vairarapa water 3ces	Wellington Regional Wararapa district or characterise the hycand the social, herit Wairarapa water racoptions for the water management option to:	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
vethod M18: Water use groups	Wellington Regional Council will: (a) support wate voluntary agn water users, t manage alloc	Il Council will: support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	(a)	support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and			
	©	provide, where available, accurate technical information to assist user groups.			
Vethod M19: Water nanagement (d)	(p)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Method M28: Development of good management practice guidelines.	Wellington Regiona develop practices, r rules) in collaboratic organisations and s	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

nave farmers ractices with the	are measured, Insert after - adverse effects – <u>that are measured</u> on aquatic	d empirical categories have been verified curs the amounts to what is currently could reflect the allocated or more if spare water has been identified	non amount. Indunts are he allocation sideration of confirmed the t are sustainable. Which is ed and eates an spectation of the can occur from
positive move which will have farmers moving forward in their practices with the reg. council??	amend Important that the effects are measured, not just modelled.	Oppose Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly Oppose The allocation amount should reflect the	current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation currently consented. Consideration of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.
implementation of policies which rely on good management practice to achieve desired environmental outcomes.	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	Water allocation amounts O Surface and groundwater allocation amounts O	
	<u>Namahanga</u> <u>Vhaitua</u> Policy R.P3: Sumulative effects In river reaches of allocating water	Figures 7.3 – 7.8	

•

Needs empirical calibration by GW	Remove sentence the model must reliably predict annual irrigation volume within an accuracy of 15%. Add after field validated model – for Wairarapa conditions.	
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed
esoddo	Amend	amend
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following oriteria:	(a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.
thedules thedule P: assifying and anaging oundwater and irface water nnectivity	chedule Q: .easonable and fficient use criteria	

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required, GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by	a water user group. In other rivers, stepdown allocations may be agreed by a water user group,	may be implemented by the Wellington Regional Council.	
chedule R:	tepdown Rocations					

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

River	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Peter Vollebregt

Submitter Number:

S409

#1530376

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

Greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matus Talao

ESE CONTRACTOR CONTRACTOR

To: Freepost 3156
Wellington Regional Council
PO Box 11646
Wellington 6142

x 11646 eton 6142

Your details			210	907 201
Full name: Leo Volleb	regt		Vi kiri. Coko (
Organisation name (if applicable):	Wairarapa V	Vater User's Inc. Socie	ty	410
Address for service: Leo	Vollebregt			
235	Pahautea Road	ביים א		
Fea	therston	T T T T T T T T T T T T T T T T T T T		
Telephone no's: Work: <u>063</u>	3088405 но	me: <u>063088405</u>	Cell: 0272588405	Andrew Car
Contact person: Leo	Vollebregt			
Address and lelephone no (if different	from above):		The same of the sa	a can planting up the
Electronic communication Wellington Regional Council has a pre	filmele följere kulture en men men men men som ste filmele för för ste följere för för som för som för som för		istural Rosquees Plan via em	
We will send you updates on the proce here □ if you do not agree to receive o	ss, information and pro	vide you with details of any med	etings and the hearing. Please	e tick
Email address:	.co.nz		and the state of t	/#h4+####
Trade competition		 		
I/we could not gain an advantag			ed this box, delete the rest of this sect	ion and
1/we could gain an advantage in	•			
If you could gain an advantage p		-		
□l/we are directly affect environment, and does t	led by an effect of the s not relate to trade comp	ubject matter of my submission etition or the effects of trade co	that adversely affects the mpetition.	
		he subject matter of my submis etition or the effects of trade co		€
Your submission			· · · · · · · · · · · · · · · · · · ·	
The specific provisions of the Propo Please continue on separate sheet(s) – an e www.gw.govt.nz/regional-plan-review	osed Natural Resource excel spreadsheet of all of	es Plan that this submission n the proposed plan provisions is av	relates to are: uilable online	
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this provision is	☐ I support the provision		
relates to is (please specify the provision/	bionisionie 2	☐ I oppose the provision☐ I wish to have the specific	provision amended	
section number):	Reasons for my submission:		ttached to this details	s form
	I seek the following decision from WRC (give precise details):			
	3			

	Atte	ndance	and wish to	be heard at h	earing(s)					
1	yes		o wish to be h This means that				ission at the hearing	ng(s).]		
		[Note: 7	o not wish to This means that ton Regional C	you cannot spe	eak at the hear	ing. However,		in your right to α	ppeal any decision made by	: the
		If other	s make a sim	ilar submissio	n, i will consi	ider presentir	ig a joint case wi	th them at a he	aring.	
	Sign	ature:					ed if making an	Date:	20/10/2015	de wrod ob ion

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

CLO

Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

€

George Ritchie

Stephen Hammond Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

		Oppose/ Amend		
efinitions Category A	Groundwater directly connected to surface	amend	The categorisation of groundwater needs clanification in the definitions.	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface
groundwat	Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in charter 7. Eigures 8.1 and 8.2 in charter 8:	14-aga-yi - 18-aga-yi - 18-aga-yi	The connectivity between various ground water takes has not been verified and	water and performed an empirical calibration of the model
Category B	and Figure 10.1 and 10.2 in chapter 10.		amongst the users there is significant doubt.	
groundwat	groundwater from category A groundwater is considered to be surface		Expecting users to individually verify as	
connected)	water allocation.		potential use of water is restricted	
Category B	Groundwater not classified as either		unnecessarily impacting on farm businesses severely.	
groundwat	category A groundwater or category C groundwater and which is defined as being		The definitions of Category A. B. and C.	
directly	directly connected to surface water through		groundwater need to be robust, and a	
connected)	applying the tests in Schedule Q (efficient use). Category B groundwater (directly		mechanism or process must be provided	
Cafegory C	connected) is at the locations generally	and the second s	particular abstraction may be tapping.	
groundwat	described in Tables 7.3 and 7.4 in chapter 7. Table 8.2 chapter 8 and Table 10.2 in		Since any conditions must be related to	
<u>.</u>	chapter 10. Taking water from category B		A (i.e. direct connection) should be able to	
	groundwater (directly connected) is considered to be surface water allocation.		demonstrate a strong and consistent relationship between daily river levels and	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	Groundwater not classified as either		daily groundwater levels. If not then	
	category A groundwater or category C		relevance. There should also be a clear	
	groundwater and which is defined as being not directly connected to surface water		and quantifiable difference between	
	through applying the tests in Schedule Q		category A & D.at present the handement approach appears to be	
	(efficient use). Category B groundwater		the same even though the two aquifers	
	generally described in Table 7.5 in chapter		are demonstrably different in their response to river levels	
	7, Table 8.3 in chapter 8 and Table 10.3 in			
	chapter 10. Taking water from category B		In February 2015 work undertaken in the	
	considered to be groundwater allocation.		recorder interfered with readings so that	
	Groundwater not directly connected to		consent holders unknowingly resumed	-
	surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,		reached minimum flow. Observers working by the river reported no adverse	

low flows indicating lkes to the river.	of what directly Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river	are vital community Add after treatment plants water race networks and facilities for the irrigation sts have made to use of pasture and crops	retain	ve enough value to the social, agricultural, industrial, cultural and use of water. current uses and also for future needs are recognised and provided for within the Plan's allocation framework"	meet certain tive should not be e Whaitua before levels are known
effects to this take at low flows indicating poor relation of the takes to the river.	amend There is no definition of what directly connected means.	amend Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	support	amend Objective does not give enough value to the use and potential use of water.	Oppose Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known
Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	the local authority wastewater and stormwater networks, systems and wastewater treatment plants	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	iic, cultural and environmental nd using water are recognised thin the Plan's allocation	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is
	iroundwater irectly onnected to urface water	legionally ignificant nfrastructure*	Jnused water	Objective O8	Objective O25 (c)

able 3.6 roundwater irectly connected	improved over time objective. Nitrate concentrations do not caus effects on groundwater-dependent on aquatic plants, invertebrate or fin connected surface water bodies	improved over time to meet that objective. Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
Djective O52	The efficiency of a improved and max by means of: (a) (b) (c) (d) (e)	The efficiency of allocation and use of water is improved and maximised through time, including by means of: (a) efficient infrastructure, and including irrigation, domestic municipal and industry practices, and contaminising reuse, recovery and recycling of water and contaminants, and contaminants, and transferred between users, and transferred between users, and inver beds.	amend	Increasing water allocation allows for growth. (a) to (e) are good means to the objective. There needs to be the possibility of storage in stream	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) enabling storage within the bed of a river
Solicy P6: Synchronised sxpiry and review lates	Resource consents common expiry or r sub-catchment, if:	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if: (a) the affected resource is fully allocated or over-allocated, or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) <u>consents will run for a period of 25 years</u>

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		Add <u>diffuse contaminants to (</u> b)						
		Add <u>diffu</u>	retain	retain				
		(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	We are pleased to see irrigation get a special mention.					
		Amend	noddns	support				
	(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.	(b) treatment, dilution and disposal of wastewater and stormwater, and	(h) irrigation and stock water, and	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	(c) there are significant social and economic benefits for the region, and	(d) water remains available for multiple in-stream and out of stream uses concurrently, and	(e) the reliability of water supply improves as a result, and	(f) the damming and storage of water contributes to the
,		olicy P7: Uses of and and water (b) and (h)		Policy P11: Instream water storage				

		efficient allocation and use of water.			
olicy P107: ramework for aking and using /ater	The framework recognises: (a) (b)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and connectivity), and the take and use of water does not exceed allocation amounts provided for in the Plan, and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence insert (d) when schedule P changes: -ve effect on consent holders - 10 year lead in time to reflect cost. +ve effect - the water availability should be released immediately."
	<u> </u>	levels are managed in accordance with the Plan provisions.			
Policy P109: Lapse tates affecting vater takes	Resource consengiven effect to wit commencement cjustified due to the activity. For the prefect to "includes water meter or floof the water in acresource consent	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	support	We support the use of water	
olicy P111; Water akes at minimum	The take and us flows or water lewers in water levels in	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

above minimum flows following a period of 10 days of continuous river levels at minimum flow		<u>As above</u>	Delete (c) (l)	
takes below minimum flows and lake levels)(d) on restrictions	should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
		Amend	osoddo	
11), with the exception that water is available below minimum flows:	(c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water wels	☆	Policy P115: Authorising takes below minimum lows and lake evels (d) and (c) i		

Retain	retain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the-plan-being-made-eperative renewal of consent to meet the criteria.
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH-R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
olicy P116: 'eallocating water	Policy P117: Supplementary allocation amounts at flows above the nedian flow	Solicy P118: Reasonable and sflicient use

when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water holder can demonstrate how the unused water will be used within four years, including by means of: (a) a capital expenditure purpose water is used for, and purpose water is used for, and efficient use criteria identified in Schedule Q (efficient use). The taking of water for storage outside a niver bed at flows above the median flow is appropriate provided Policy P117 is satisfied. The temporary or permanent transfer of the whole consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use water shall be and use water shall be and use of transferred water.
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	(q)	the transfer occurs within the same catchment management unit, and			
	9	the same or a lesser amount of water is being taken or used, and			
	(p)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(a)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
<u> 3ules</u>					
Rule R135: Seneral rule for aking, use, lamming and liverting water fiscretionary activity	The damming otherwise conti the Resource In permitted, conti discretionary, n activity is a disc	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137; Farm	The take and ubody (other the Rule R138) or	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

id milk-cooling ster – permitted stivity	farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:		(b) delete words after " property." Leaving this in is anti growth and development and not in the best interests	(b) the total take shall be no more than 70L pe day per stock unit based on the maximum herd size on the property at any-time
	(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and		of the Wairarapa	during the three-years-prior to the-date-of public notification of the Proposed Natural Resources-Plan (31.07.2015), and
	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.			Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136. In respect of condition (b) the Wellington Regional
	In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.			Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.
Rule R143: -emporary water sermit transfers – controlled activity	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	amend	Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled	Delete Controlled and make this rule a <u>permitted</u> activity
Rule R144: Transferring water sermits – restricted liscretionary ctivity	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	support		retain
Other methods				

Jethod M18: Water Wellington Regional Council will: Jee groups (a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and manage allocations, and imes of restrictions or when the catchment is fully allocated, and and (c) provide, where available, accurate technical information to assist user groups. Wethod M19: Water (d) promoting alternatives to the ananagement (d) use of water races, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
(c) provide, where available, accurate technical information to assist user groups. (d) promoting alternatives to the use of water races, and			
(d) promoting alternatives to the use of water races, and			
	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to quantify costs and benefits of water races and explore alternatives
Method M28: Wellington Regional Council will continue to Sevelopment of develop practices, procedures and tools (including jood management rules) in collaboration with industry, other relevant practice guidelines. organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
<u>Vuamahanga</u> <u>Vhaitua</u> Policy R.P3; Cumulative effects on river reaches of	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects - <u>that are measured</u> on aquatic
Figures 7.3 – 7.8	Water allocation amounts	Oppose	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly.	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u>[ables 7.3 – 7.5</u>	Surface and groundwater allocation amounts	Oppose	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identified

	esoddo	Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Needs empirical calibration by GW
Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following	Amend	Remove sentence "the model must reliably predict annual infgation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	Remove sentence t he model must reliably predict annual-irrigation-volume-within an accuracy-of-15% Add after field validated model – <u>for Wairarapa conditions</u>
(a) an irrigation application efficiency of 80%, and(b) demand conditions that occur in nine out of 10 years.	amend	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed	(a) add after 80% - where practicable.

chedule R: tuideline for	When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Support with amendments	Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	
tepdown Ilocations	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river		However needs of stock drinking water and rootstock protection needs acknowledging	Add after health needs of people - stock drinking water and rootstock protection
	flows. Typically, the reduction in water take that may be required will be half the consented amount. Stepdown allocations for specific rivers are		However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish in consultation with water users.	Table R1 is interim GW to consult with water users
	a water user group. In other rivers, stepdown allocations may be agreed by a water user group,		As water is cleaned up the minimum flow requirement for dilution is lower.	
	or in the absence of agreement of such a group, may be implemented by the Wellington Regional Council.		The effects of low flows needs to demonstrated as are the effects of restrictions	
			There also needs to be room for the Whaitua to have their input	

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

River	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

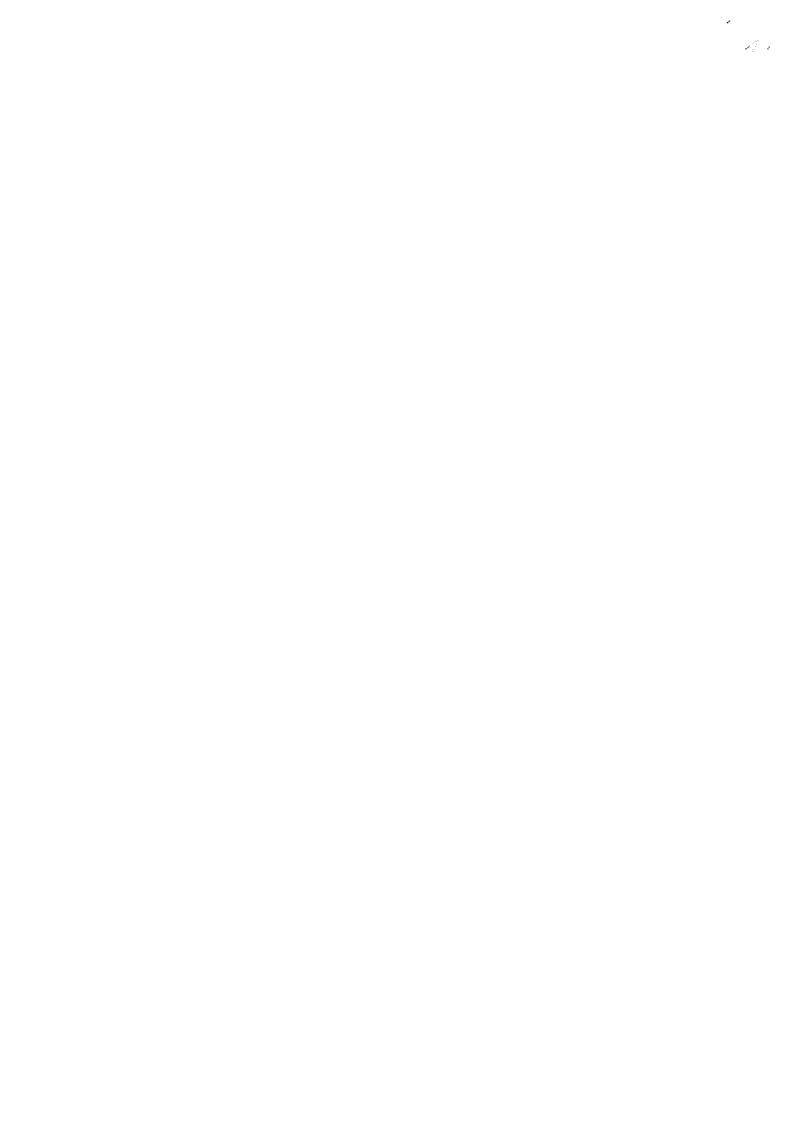
Proposed Natural Resources Plan:

Submitter:

Richard John and Carolyn Ann Stevenson

Submitter Number:

S410



#1530376

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

Greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matus Talao

To:

Freepost 3156 Wellington Regional Council PO Box 11646

Wellington 6142

GRZ COLENSON (SEE) Balance contint

Your details	······································	2		ZIÛCT
Full name: Leo Vollebi	egt			
Organisation name (if applicable):	Wairarapa \	Water User's Inc. So	ciety	Ц.
	Vollebregt			
235	Pahautea Road	i, RD1,	-	an annanananani ety y anananapidayiy ida i iliki ilifadiy edy eryyanananan ah
Fea	therston			7 - 0 - 0 - 0 - 0 - 0 - 0 - 0 - 0 - 0 -
Telephone no's: Work: <u>063</u>	088405 н	ome: <u>063088405</u>	Cell:	0272588405
Conlact person: Leo	/ollebregt			
Address and telephone no (if different t	rom above):	##-4**	AA TARAH TARAH PERANGAN ANGAN BAY BAYA TARAHAYAY	
Electronic communication Wellington Regional Council has a pref We will send you updates on the proce here \(\sigma\) if you do not agree to receive o Email address: ITVOII (() Xtra.	ss, information and pro ommunication via ema	ovide you with details of any	meelings ar	nd the hearing. Please tick

I/we could not gain an advantage go straight to Your submission? I/we could gain an advantage in If you could gain an advantage p	trade competition throu	ugh this submission The following:		
		subject matter of my submiss petition or the effects of trade		
		the subject matter of my sub petition or the effects of trade		
Your submission	······································		- 	that the same and
The specific provisions of the Propo Please continue on separate sheet(s) - an e www.gw.govt.nz/regional-plan-review				
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this provision is →	☐ I support the provision		
relates to is (please specify the provision/	provision is	☐ I oppose the provision ☐ I wish to have the spe		on amended
section number):	Reasons for my submission: : ->	our submission i	s attach	ed to this details for
	<u> </u>			
	I seek the following decision from WRC			

	Atte	ndance and wish to be heard at hearing(s)		
/	yes	I/We do wish to be heard in support of my/our submission [Note: This means that you wish to speak in support of your submission at the hearing(s)).]	
		I/We do not wish to be heard in support of my/our submission [Note: This means that you cannot speak at the hearing. However, you will still retain yo Wellington Regional Council to the Environment Court.]	ur right to	uppeal any decision made by the
		If others make a similar submission, I will consider presenting a joint case with the	nem at a h	earing.
	Sign	[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]	Date:	20/10/2015

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

Leo Vollebregt

CLO

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

€

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
efinitions				
Category A groundwat er Category B groundwat er (directly connected) Category B groundwat er (not directly connected) Category C groundwat er er er (not directly connected)	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water from category C groundwater and which is defined as being not directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (not directly connected) is chapter 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7, shown in Figures 7.2-7.9 in chapter 7,	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category aquifer a particular abstraction may be tapping. Since any conditions must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B.at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Waihenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model

			(c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	
Remove	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	oppose	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:	Objective O25 (c)
the social, <u>agricultural, industrial,</u> cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"	Objective does not give enough value to the use and potential use of water.	amend	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	Objective O8
retain		support	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	Jnused water
Add after treatment plants water race networks and facilities for the irrigation of pasture and crops	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	amend	stormwater authority wastewater and stormwater networks, systems and wastewater treatment plants	tegionally ignificant nfrastructure*
Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river	There is no definition of what directly connected means.	amend	9 12 st G	iroundwater irectly onnected to urface water
	effects to this take at low flows indicating poor relation of the takes to the river.		Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.	
				,

	igo	improved over time to meet that objective.			
able 3.6 roundwater irectly connected surface water	Nitrate concentra effects on grounc on aquatic plants in connected surf	Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed numan drinking water standards, i.e. 11.3
Objective O52	The efficiency of improved and maby means of:	The efficiency of allocation and use of water is improved and maximised through time, including by means of:	amend	Increasing water allocation allows for growth.	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of:
	(a)	efficient infrastructure, and		(a) to (e) are good means to the objective.	(a) to (e) are good means to the objective.
	(q)	good management practice, including irrigation, domestic municipal and industry practices, and		There needs to be the possibility of storage in stream	Add (f) enabling storage within the bed of a river
	<u>©</u>	maximising reuse, recovery and recycling of water and contaminants, and			
	(p)	enabling water to be transferred between users, and			
	(e)	enabling water storage outside river beds.			
Synchronised sxpiry and review lates	Resource consents common expiry or r sub-catchment, if:	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if:	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in	Retain Add (c) <u>consents will run for a period of 25 years</u>
	(a)	ure affected resource is fully allocated or over-allocated, or		infrastructure a long consent is necessary.	

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	(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.			
olicy P7: Uses of and and water (b) and (h)	(b) treatment, dilution and disposal of wastewater and stormwater, and	Amend	(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	Add <u>diffuse contaminants to (</u> b)
	(h) irrigation and stock water, and	support	We are pleased to see irrigation get a special mention.	retain
Solicy P11: Instream water storage	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	support		retain
	(c) there are significant social and economic benefits for the region, and			
	(d) water remains available for multiple in-stream and out of stream uses concurrently, and	A. V.		
	(e) the reliability of water supply improves as a result, and			
	(f) the damming and storage of water contributes to the			

		efficient allocation and use of water.			
olicy P107; ramework for aking and using rater	The framework trecognises: (a)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence insert (d) when schedule P changes; -ve effect on consent holders — 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
	(a)	the take and use of water does not exceed allocation amounts provided for in the Plan, and		businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	
	9	minimum flows or water levels are managed in accordance with the Plan provisions.			
Policy P109: Lapse lates affecting vater takes	Resource consengiven effect to wit commencement commencement justified due to the activity. For the peffect to "includes water meter or floof the water in acresource consent	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	support	We support the use of water	
Policy P111: Water akes at minimum	The take and us flows or water le water levels in	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

above minimum flows following a period of 10 days of continuous river levels at minimum flow	As above	Delete (c) (j)	
takes below minimum flows and lake levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
	Amend	esoddo	
11), with the exception that water is available below minimum flows: (c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water wels	Policy P115: Authorising takes below minimum lows and lake evels d) and (0) i		

Retain	retain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the plan-being made-operative renewal of consent to meet the criteria"
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
olicy P116: teallocating water	Policy P117: Supplementary allocation amounts at flows above the nedian flow	Policy P118: Reasonable and Afficient use

,	operative to meet the criteria,		
olicy P119: nused water	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of: (a) a capital expenditure programme linked to the	Support	Retain
	purpose water is used for, and (b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).		
Policy P120; Faking water for storage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	Refain
Policy P128; Transfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use of transferred water are the same or less, and	Support	retain

	(a)	the transfer occurs within the same catchment management unit, and			
	<u> </u>	the same or a lesser amount of water is being taken or used, and			
	(b)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(e)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
Rules					
Rule R135: Seneral rule for aking, use, tarming and liverting water - tiscretionary	The damming o otherwise contrathe Resource M permitted, contradiscretionary, no activity is a discretionary.	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137: Farm	The take and us body (other than Rule R138) or g	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

Vairarapa water aces	Wellington Regic Wairarapa distric characterise the and the social, h Wairarapa water options for the w management opt	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	and economic values of the Wairarapa water races
Vethod M18: Water use groups	Wellington Regional Council will: (a) support wate vers, the value of the value alloo support wate alloo support wate assist with wate times of restricts and and	support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	(5)	provide, where available, accurate technical information to assist user groups.			
Method M19: Water nanagement (d)	(p)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Method M28: Development of good management practice guidelines.	Wellington Regic develop practice rules) in collabor organisations an	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

				ı
Change the allocation amounts to what is currently allocated or more if spare water has been identified	verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly. The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation currently consented. Consideration of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation imit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Oppose	Surface and groundwater allocation amounts	[ables 7.3 – 7.5
Insert after - adverse effects – <u>that are measured</u> on aquatic	Important that the effects are measured, not just modelled.	amend	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	<u>Vhaitua</u> Vhaitua Volicy R.P3: Sumulative effects on river reaches of allocating water
	positive move which will have farmers moving forward in their practices with the reg. council??		implementation of policies which rely on good management practice to achieve desired environmental outcomes.	

thedule P: assifying and anaging oundwater and irface water innectivity		esoddo	Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm	Needs empirical calibration by GW
chedule Q: teasonable and flicient use criteria	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following oritena:	Amend	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	Remove sentence the model-must reliably predict annual imigation-volume within an accuracy of 15% Add after field validated model – for Wairarapa conditions
	(a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.	amend	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed	

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by	a water user group. In other nivers, stepdown allocations may be agreed by a water user group,	or in the absence or agreement or such a group, may be implemented by the Wellington Regional Council.	
chedule R: Juideline for	tepdown llocations					

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

	flow (L/sec)	shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Wanagement point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
1	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga Ríver	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Andrew Harvey

Submitter Number:

S411

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON REGIONAL COUNCIL Te Pane Matur Talao

To:

Wellington 6142

Freepost 3156 Wellington Regional Council PO Box 11646 examinate akaon Association

Your details			Z 7 0 0 7 2015
Full name: Leo Vollebi	egt		GROED GR
Organisation name (if applicable):	Wairarapa V	Vater User's Inc. Society	4.10 p
	Vollebregt		
235	Pahautea Road	, RD1,	The Branch will be where the property of the Control of the Contro
Fea	therston		
Telephone no's: Work: <u>063</u>	088405 Ho	ome: <u>063088405</u> Cell: <u>027</u> 2	2588405
Contact person: Leo	/ollebregt		
Address and telephone no (if different f	rom above):		
Electronic communication			THE ACCURACY VICTOR THE
Wellington Regional Council has a pref We will send you updates on the proce here □ if you do not agree to receive c	ss, information and pro	formation about the Proposed Natural Resource wide you with details of any meetings and the he it.	s Plan via email. earing. Please tick
Email address: Irvoll@xtra.	co.nz		***************************************
Trade competition			· · · · · · · · · · · · · · · · · · ·
go straight to 'Your submission']		hrough this submission [If you ticked this box, delete the	e rest of this section and
 I/we could gain an advantage in t 	·	-	
lf you could gain an advantage p	lease complete one of	the following:	
		ubject matter of my submission that adversely a retition or the effects of trade competition.	ffects the
		the subject matter of my submission that adverse the settlion or the effects of trade competition.	ely affects the
Your submission		**************************************	**************************************
The specific provisions of the Propo Please continue on separate sheet(s) - an e www.gw.govt.nz/regional-plan-review	osed Natural Resource excel spreadsheet of all of	es Plan that this submission relates to are: the proposed plan provisions is available online	
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this provision is.	☐ I support the provision	
relates to is (please specify the provision/	provision is. ">	☐ I oppose the provision☐ I wish to have the specific provision amend	ded
section number):	Reasons for my	our submission is attached to t	
		}	
	I seek the following decision from WRC		
	(give precise datails): →		

	Atte	ndance a	nd wish to	be heard at	hearing(s)	:						
(yes			eard in supp you wish to s			n Ibmission at the l	nearing(s).]				
		[Note: Thi	is means that	be heard in s you cannot sp council to the	eak at the h	earing. Howe		retain your	right to a	ppeal a	uny decision made by	· the
		If others	make a sim.	lar submissi	on, I will co	nsider prese	nting a joint cas	se with the	m at a he	aring.		
	Sign						ign quired if making	an	Date:	about out.	20/10/2015	18- HF-M**********************************

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

CLO

Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

€

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

TIOVESIOII	Text	Support/ Oppose/ Amend	CIDO CONTRACTOR OF THE CONTRAC	Netter sought
efinitions				
Category A groundwat er	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8;	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model
Category B groundwat er (directly connected)	and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation.		doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted	
Category B groundwat	Groundwater not classified as either category A groundwater or category C		unnecessarily impacting on farm businesses severely.	
er (not directly	directly connected to surface water through		The definitions of Category A, B and C groundwater need to be robust, and a	
connected)	appiying the tests in Schedule & Girclein use). Category B groundwater (directly		mechanism or process must be provided for identifying which Category aquifer a	
Category C groundwat	described in Tables 7.3 and 7.4 in chapter		particular abstraction may be tapping. Since any conditions must be related to	
e.	/, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B		the 'effects', it would seem that Category A (i.e. direct connection) should be able to	
	groundwater (directly connected) is considered to be surface water allocation.		demonstrate a strong and consistent relationship between daily river levels and	
	Groundwater not classified as either		daily groundwater levels. If not then conditions linked to low flows will have no	~
	category A groundwater or category C aroundwater and which is defined as being		relevance. There should also be a clear	
	not directly connected to surface water		Category A & B.at present the	
	(efficient use). Category B groundwater		management approach' appears to be the same even though the two aquifers	
	(not directly connected) is at the locations generally described in Table 7.5 in chapter		are demonstrably different in their response to river levels.	
	7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B		In Eebrase 2015 work undertaken in the	
	groundwater (not directly connected) is considered to be groundwater allocation.		river bed by the Waihenga river level	
			consent holders unknowingly resumed	
	Surface water at the locations generally		taking water even though the river had reached minimum flow. Observers	
	Shown in Figures 7.2-7.9 in chapter 7,		working by the river reported no adverse	

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
legionally ignificant nfrastructure*	the local authority wastewater and stormwater networks, systems and wastewater treatment plants	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Inused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	esoddO	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

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7. 7. 0.	do do	improved over time to meet that objective.	5	incontraction defined	in the second se
able 3.0 roundwater irectly connected) surface water	Nitrate concentre effects on groun on aquatic plant in connected sur	Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	alliend	The actual numerical amount needs to be stated	drinking water standards, i.e. 11.3
Objective O52	The efficiency of improved and m by means of:	The efficiency of allocation and use of water is improved and maximised through time, including by means of:	amend	Increasing water allocation allows for growth.	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of:
	(a)	efficient infrastructure, and		(a) to (e) are good means to the objective.	(a) to (e) are good means to the objective.
	(q)	good management practice, including irrigation, domestic municipal and industry practices, and		There needs to be the possibility of storage in stream	Add (f) enabling storage within the bed of a river
	<u></u> ©	maximising reuse, recovery and recycling of water and contaminants, and			
	(p)	enabling water to be transferred between users, and			
	(e)	enabling water storage outside river beds.			
Policy P6: Synchronised sxpiry and review lates	Resource consents common expiry or r sub-catchment, if:	Resource consents may be granted with a common explity or review date within a whaitua or sub-catchment, if: (a) the affected resource is fully allocated or over-allocated, or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years. Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) <u>consents will run for a period of 25 years</u>

			of w	
			the damming and	
			(e) the reliability of water supply improves as a result, and	
			(d) water remains available formultiple in-stream and out of stream uses concurrently, and	
			(c) there are significant social and economic benefits for the region, and	
retain		support	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	Policy P11: Instream water storage
retain	We are pleased to see irrigation get a special mention.	support	(h) irrigation and stock water, and	
Add <u>diffuse contaminants to (b)</u>	(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	Amend	(b) treatment, dilution and disposal of wastewater and stormwater, and	olicy P7: Uses of and and water (b) and (h)
			(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.	
				,

		efficient allocation and use of water.			
olicy P407: ramework for aking and using rater	The framework frecognises: (a)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence linsert (d) when schedule P changes; -ve effect on consent holders — 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
	<u>(a)</u> (b)	the take and use of water does not exceed allocation amounts provided for in the Plan, and minimum flows or water levels are managed in accordance with the Plan provisions.		economies severely and unnecessarily. An empirical calibration is necessary.	
Policy P109: Lapse tates affecting vater takes	Resource consengiven effect to wit commencement commencement justified due to the activity. For the peffect to" includes water meter or flo of the water in acresource consent	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	poddns	We support the use of water	
Policy P111; Water akes at minimum	The take and us flows or water le	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

above minimum flows following a period of 10 days of continuous river levels at minimum flow		As above	Delete (c) (i)	
takes below minimum flows and lake levels)(d) on restrictions	should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
		Amend	esoddo	
11), with the exception that water is available below minimum flows:	(c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water vels	≈	olicy P115: Authorising takes selow minimum lows and lake evels (d) and (c) i		

	Refain	refain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the-plan-being-made-operative renewal of consent to meet the criteria.
			The investment in infrastructure is considerable and time is required to implement changes
	Support	support	amend
	Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R.1, WH.R.1 and K.R.1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
	olicy P116: eallocating water	Policy P117: Supplementary allocation amounts at flows above the nedian flow	Policy P118: Reasonable and sflicient use

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	operative to meet the criteria, and		
olicy P119: nused water	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of: (a) a capital expenditure programme linked to the purpose water is used for and	Support	Retain
	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).		
olicy P120; Faking water for storage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	Retain
olicy P128: Fransfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use of transferred water are the same or less, and	Support	retain

	(q)	the transfer occurs within the same catchment management unit, and			
	(9)	the same or a lesser amount of water is being taken or used, and			
	(Đ)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(a)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
<u>kules</u>					
Rule R135: Seneral rule for aking, use, tamming and tiverting water riscretionary activity	The damming or otherwise contra the Resource Mi permitted, contra discretionary, no activity is a discretionary.	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137: Farm	The take and us body (other that Rule R138) or g	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

(b) the total take shall be no more than 70L peday per stock unit based on the maximum herd size on the property at any time	during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and Note	Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136. In respect of condition (b) the Wellington Regional	Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	Delete Controlled and make this rule a <u>permitted</u> activity	retain	
(b) delete words after "property." Leaving this in is anti growth and development and not in the best interests	of the wairarapa			Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled		
				amend	support	
farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:	(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.	In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	
id milk-cooling ster – permitted stivity				Rule R143: Temporary water sermit transfers— Controlled activity	Rule R144: Transferring water sermits – restricted liscretionary sctivity	Other methods

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aces Wks chicken and and and and and and and and and an	ellington Regic lairarapa distric naracterise the id the social, hr alirarapa water vilons for the wanagement opt	Wellington Regional Council will work with Walrarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Walrarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
Method M18: Water	(a) (b)	Wellington Regional Council will: (a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and (b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	©	provide, where available, accurate technical information to assist user groups.			
Vethod M19: Water nanagement (d)	(p)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Method M28: Development of de jood management rul rul practice guidelines.	fellington Regic svelop practice: les) in collabor ganisations an	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
tuamahanga Whaitua Policy R.P3: Sumulative effects on river reaches of allocating water	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects – <u>that are measured</u> on aquatic
Figures 7.3 – 7.8	Water allocation amounts	esoddo	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u>[ables 7.3 7.5</u>	Surface and groundwater allocation amounts	Oppose	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation currently consented. Consideration of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identiffec

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Needs empirical calibration by GW	Remove sentence the model-must-reliably predict annual irrigation volume within an accuracy of 15%. Add after field validated model – for Wairarapa conditions. (a) add after 80% - where practicable.	
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required. irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed	
esoddo	Amend	
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and colimatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following criteria: (a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.	
thedules shedule P: assifying and anaging oundwater and irface water nnectivity	chedule Q: !easonable and fficient use criteria	

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by	a water user group. In other rivers, stepdown allocations may be agreed by a water user group,	of iff the absence of agreement of such a group, may be implemented by the Wellington Regional Council.	
chedule R:	tepdown Rocations					

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

River	Winimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau Ríver	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Shane Gray

Submitter Number:

S412

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON
REGIONAL COUNCIL
TE Pane Matus Talae

AKATO A AMBO BELGO 1 Publico A Dominion

To:

Freepost 3156 Wellington Regional Council PO Box 11646

Wellington 6142

Your details			21001	- 2015
Full name: Leo Volleb	regt		阿拉克斯 克	(I)
Organisation name (if applicable):	Wairarapa \	Water User's Inc. Soci		
Address for service: Lec	Vollebregt)
235	5 Pahautea Road	ו הטטיו		-
Fea	atherston		75 V-1 1144 - 3 1	-
Telephone no's: Work: <u>06</u> :	3088405 на	ome: <u>063088405</u>	Cell: 0272588405	
Contact person: Leo	Vollebregt			
Address and telephone no (if different		E-11-1-13-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-		•
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Wellington Regional Council has a pre We will send you updates on the proc here □ if you do not agree to receive o	ess, information and pro	ovide you with details of any me	Natural Resources Plan via email. Jetings and the hearing. Please tick	
Email address: Irvoll@xtra	i.co.nz	ur ki inkinkarika in disigi i diriki in puncidi penggapangan ang penggapanga kara kilanga pe		
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Trade competition				
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□ I/we could gain an advantage in	trade competition throu	igh this submission		
If you could gain an advantage	please complete one of	the following:		
		subject matter of my submission petition or the effects of trade co		
		the subject matter of my submi petition or the effects of trade co		
Your submission				-
The specific provisions of the Prop Please continue on separate sheet(s) – an www.ew.govt.nz/regional-plan-review				
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this provision is.	☐ I support the provision]
relates to is (please specify the provision/	provision is.	☐ I oppose the provision☐ I wish to have the specifi-	c provision amended	
section number):	Reasons for my submission:: ->		attached to this details for	m
	I seek the following decision from WRC (give precise details):			
		<u> - </u>		

	Atten	dance	and wish	to be he	ard at he	aring(s)								
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		if other	s make a s	imilar sul	bmission,	I will cor	nsider pres	senting a	joint case	e with the	em at a h	earing.		
	Signa	ature:	on behalf		making su		uthorised to		f making a	n	Date:	ugydk Asia	20/10/2015	

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

...

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

Leo Vollebregt

CLO=

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

€

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

amend The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been venified and amongst the users there is significant doubt. Expecting users to Individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category aquifer a particular abstraction may be tapping. Since any conditions must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a dear and quantifiable difference between Category A & B. at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Waihenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had recorder interfered with readings so that the particular and main water even though the river had recorder interfered with readings are recorder interfered with readings were reading to the consent holders unknowingly resumed taking water even though the river had maintering and consent holders unknowingly resumed taking water even though the river had maintering and consent holders unknowingly resumed taking water even though the river had maintering and consent holders unknowingly resumed taking water even the maintering and consent holders unknowingly resumed taking water even the maintering and consent holders unknowingly resumed.	Groundwater directly connected to surface water all the coaleon/setion of groundwater not classified as either category A groundwater not classified as either connected is at the locations generally solven in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.8 in or hapter 8. and figure 8.1 and 8.2 in chapter 8. and figure 10.1 and 10.2 in chapter 10. Taking water from category A groundwater or category C groundwater not classified as being groundwater and without seed in the coaleons generally described in Tables 7.3 and 7.4 in chapter 8. Table 8.2 chapter 8 and 7 also chapter 10. Table 8.2 and 7 also chapter 10.2 and 5 and	Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
		Category A groundwat er Category B groundwat er (directly connected) Category B groundwat er (not directly connected) Category C groundwat er	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater or category C groundwater and which is defined as being not directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater from category C groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7, shown in Figures 7.2-7.9 in chapter 7,	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been venified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category A, B and C groundwater need to be robust, and a mechanism or process must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily niver levels and quantifiable difference between conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B. at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Waithenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers	

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
legionally ignificant nfrastructure*	 the local authority wastewater and stormwater networks, systems and wastewater treatment plants 	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Jnused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework."
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	Oppose	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

able 3.6 roundwater irectly connected	impoble of the concentral objects on ground on aquatic plants in connected surfix	improved over time to meet that objective. Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
)bjective O52	The efficiency of improved and maby means of: (a) (b) (d) (e)	The efficiency of allocation and use of water is improved and maximised through time, including by means of: (a) efficient infrastructure, and including irrigation, domestic municipal and industry practices, and (c) maximising reuse, recovery and recycling of water and contaminants, and transferred between users, and transferred between users, and transferred between users, and inver beds.	amend	Increasing water allocation allows for growth. (a) to (e) are good means to the objective. There needs to be the possibility of storage in stream	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) enabling storage within the bed of a river
Policy P6: Synchronised sxpiry and review lates	Resource consents common expiry or r sub-catchment, if.	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if: (a) the affected resource is fully allocated or over-allocated, or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) <u>consents will run for a period of 25 years</u>

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		Add diffuse contaminants to (b)	retain	retain				
		(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	We are pleased to see irrigation get a special mention.					
		Amend	support	support				
	(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.	(b) treatment, dilution and disposal of wastewater and stormwater, and	(h) irrigation and stock water, and	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	(c) there are significant social and economic benefits for the region, and	(d) water remains available for multiple in-stream and out of stream uses concurrently, and	(e) the reliability of water supply improves as a result, and	(f) the damming and storage of water contributes to the
,		olicy P7: Uses of and and water (b) and (h)		Solicy P11: Instream water storage				

		efficient allocation and use of water.			
olicy P107: ramework for sking and using rater	The framework frecognises: (a) (b)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and (b) the take and use of water does not exceed allocation amounts provided for in the Plan, and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence insert (d) when schedule P changes: -ve effect on consent holders — 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
	<u> </u>	minimum flows or water levels are managed in accordance with the Plan provisions.			
Policy P109: Lapse lates affecting vater takes	Resource consengiven effect to wit commencement commencement justified due to the activity. For the prefect to "includes water meter or floor the water in acresource consent.	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	poddns	We support the use of water	
olicy P111: Water akes at minimum	The take and us flows or water le water levels in t	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

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ows and water	11), with the exception that water is available below minimum flows:	ta Te	takes below minimum flows and lake levels)(d) on restrictions	above minimum flows following a period of 10 days of continuous river levels at minimum flow
∽	(c)as authorised by resource consents in accordance with Policy P108.	# 22 <u>#</u> 22 <u>*</u> 87	should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	
olicy P115: Authorising takes selow minimum lows and lake evels	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	Amend Ti	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	<u>As above</u>
	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	oppose ac	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	Delete (c) (i)
	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where			
	no practical alternative sources of water are available or accessible, and			

Retain	refain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the-plan-being-made-operative renewal of consent to meet the criteria."
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing resource consents have a period of four years from the date of the plan being made
olicy P116: ;eallocating wafer	Solicy P117: Supplementary allocation amounts at flows above the nedian flow	Policy P118: Reasonable and fficient use

	Retain		Retain	refain
	Support		Support	Support
operative to meet the criteria, and	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of: (a) a capital expenditure programme linked to the programme linked to the purpose water is used for, and	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use of transferred water are the same or less, and
	olicy P119; nused water		olicy P120: aking water for itorage	olicy P128: Transfer of esource consents

	(q)	the transfer occurs within the same catchment management unit, and			
	(O)	the same or a lesser amount of water is being taken or used, and			
	(b)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(e)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
<u>snles</u>					
Rule R135; Seneral rule for aking, use, farming and liverting water – liscretionary	The damming o otherwise contrathe Resource M permitted, contradiscretionary, no activity is a discretionary.	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137: Farm sairy washdown	The take and us body (other tha Rule R138) or g	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

(q)	during the three-years prior to the date of public notification of the Proposed Natural Resources-Plan (31.07.2015), and	Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136.	Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	Delete Controlled and make this rule a <u>permitted</u> activity	retain	
(b) delete words after "property." Leaving this in is anti growth and development and not in the best interests	of the Walrarapa			Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled		
				amend	support	
farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:	(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.	In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	
id milk-cooling ater – permitted ativity				Rule R143: Temporary water Dermit transfers — controlled activity	Rule R144: Transferring water sermits – restricted liscretionary ctivity	Other methods

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lethod M13: Vairarapa water sces	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
Wethod M18. Water use groups	Wellington Regional Council will: (a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and (c) provide, where available,	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
Wethod M19: Water nanagement (d)		amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Method M28: Development of yood management practice guidelines.	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

	Insert after - adverse effects – <u>that are measured</u> on aquatic	Do not include figures 7.3 – 7.8 in the plan until categories have been verified	Change the allocation amounts to what is currently allocated or more if spare water has been identified
positive move which will have farmers moving forward in their practices with the reg. council??	Important that the effects are measured, not just modelled.	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	The allocation amount should reflect the current consented allocation amounts. Some of the allocation amounts are considerably lower than the allocation of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.
	amend	Oppose	Oppose
implementation of policies which rely on good management practice to achieve desired environmental outcomes.	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	Water allocation amounts	Surface and groundwater allocation amounts
	<u>tuamahanga</u> <u>Vhaitua</u> Policy R.P3: Sumulative effects on river reaches of allocating water	Figures 7.3 – 7.8	<u>Fables 7.3 ~ 7.5</u>

inedules shedule P: assifying and anaging oundwater and irface water innectivity		esoddo	Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm	Needs empirical calibration by GW
chedule Q: (easonable and fficient use criteria	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-franspiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following	Amend	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	Remove sentence the medel must reliably predict annual irrigation volume within an accuracy of 15% Add after field validated model – for Wairarapa conditions
	(a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.	amend	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed	(a) add after 80% - where practicable.

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users			
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments					
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount. Stepdown allocations for specific rivers are	a water user group. In other rivers, stepdown allocations may be agreed by a water user group, or in the observe of agreed by a water user group, or in the observe of agreement or each a group.	Council.	
chedule R:	tepdown Hocations				

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

Ríver	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa Ríver	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[fower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga Ríver	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Mike Warren

Submitter Number:

S413

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON
REGIONAL COUNCIL
TO PARE MATUR TELEO

To:

7.

Freepost 3156 Wellington Regional Council PO Box 11646

Wellington 6142

ARTHUR MUNICIPAL S Salutan da Maria

Your details				ZIÚCT
Full name: Leo Vollet	pregt			FROST R
Organisation name (if applicable):	Wairarapa \	Water User's Inc. Soc		4.
	Vollebregt			
235	5 Pahautea Road	d, RD1,		
Fea	atherston	enter enterentementalen enterentementalen enterentementalen enterentementalen enterentementalen enterentemental	MAA 4- AAA	
Telephone no's: Work: 06	<u>3088405</u> н	ome: <u>063088405</u>	Cell: 0272	588405
Contact person: Leo	Vollebregt	and the state of t		
Address and telephone no (if different	from above):	deren i meneran men men men inka men daka pila pilapa pika pilapa pana pana kana kana kana kana kana k	PRO V SPEČ V MIN A MINE I NE ESTE ARRAGE RATINGO A SPANJANOV AND	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Electronic communication			ar promote meet a dage grapping distribution of the second consequences were second	
Wellington Regional Council has a pro	eference for providing in	nformation about the Proposed	ł Natural Resources	Plan via email.
We will send you updates on the proc here □ if you do not agree to receive	ess, information and pr	ovide you with details of any n	neetings and the hea	ring. Please tick
Email address: Irvoll@xtra	a.co.nz	o en de descripción de la company de la comp		
——————————————————————————————————————				
Trade competition				
/⊖S □ I/we could not gain an advantaç	ge in trade competition	through this submission (If you	licked this box, delete the	rest of this section and
go straight to 'Your submission']				
 I/we could gain an advantage in 	trade competition throi	ugh this submission		
if you could gain an advantage	please complete one of	f the following:		
		subject matter of my submission petition or the effects of trade		ects the
		the subject matter of my subn	•	ly officials the
environment, and does	not relate to trade com	petition or the effects of trade	competition.	y anects the
Your submission				
The specific provisions of the Prop Please continue on separate sheet(s) - an	osed Natural Resource excel spreadsheet of all of	ses Plan that this submission f the proposed plan provisions is	n relates to are: available online	
www.gw.govt.nz/regional-plan-review	•	, to the first feet and the fee		
The specific provision of the Proposed	My submission on this	☐ I support the provision		
Natural Resources Plan that my submission relates to is (please specify the provision/	provision is>	☐ I oppose the provision☐ I wish to have the speci	ific provision amend	ha
section number):	Reasons for my			
***************************************	submission: : ->	our submission is	attached to th	is details for
	Least the following		***************************************	
	I seek the following decision from WRC			
	(give precise datails):	1		

	Atte	ndance	and wish to	be heard at	hearing(s)						
1	yes		o wish to be h This means that					he hearing(s).]	1			
		[Note: 7	o not wish to This means that ton Regional C	you cannot sp	eak at the l	nearing. How		still retain you	r right to a	ippeal a	ny decision made by	the
		If other	s make a sim	lar submissi	on, I will co	nsider prese	enting a joint	case with the	em at a he	earing.		
	Sign	ature:					sign equired if mak	ing an	Date:	escent const	20/10/2015	· VI 8/4 8/89 (8/11)

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

Leo Vollebregt

CLO=

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

€

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

	Text	Support/ Oppose/ Amend	Reasons	Relief sought
,				
Category A groundwat er Category B groundwat er (directly connected) Category B groundwat er (not directly connected) Category C groundwat er er	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater and which is defined as being not directly connected to surface water allocations of efficient use). Category B groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is at the location. Groundwater (not directly connected) is considered to be groundwater allocation.	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category A, B and C groundwater need to be robust, and a mechanism or process must be related to the 'effects', It would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B.at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Waihenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
legionally ignificant nfrastructure*	the local authority wastewater and stormwater networks, systems and wastewater treatment plants	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Inused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	esoddO	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaltua before current water quality levels are known	Remove

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able 3.6 roundwater irectly connected	improved over time objective. Nitrate concentrations do not caus effects on groundwater-dependent on aquatic plants, invertebrate or fin connected surface water bodies	improved over time to meet that objective. Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
Objective O52	The efficiency of a improved and max by means of: (a) (b) (c) (d)	The efficiency of allocation and use of water is improved and maximised through time, including by means of: (a) efficient infrastructure, and including irrigation, domestic municipal and industry practices, and practices, and contaminants, and contaminants, and contaminants, and transferred between users, and transferred between users.	amend	Increasing water allocation allows for growth. (a) to (e) are good means to the objective. There needs to be the possibility of storage in stream	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) enabling storage within the bed of a river
olicy P6: Synchronised sxpiry and review lates	Resource consents common expiry or r sub-catchment, if.	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if: (a) the affected resource is fully allocated or over-allocated, or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) <u>consents will run for a perjod of 25 years</u>

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source ability grated water habitat sub-sub-sub-sub-sub-support support such for the aliable and water result, source to the to the to the sub-sub-sub-sub-sub-sub-sub-sub-sub-sub-	(b) recognises the use of water for diluting Add diffuse contaminants to (b) wastewater and stormwater. Diffuse contaminants need to be included.	We are pleased to see irrigation get a special mention.	retain			
sour ability and thabity and t	-		support	 <u>. </u>		
, p w	dilution and disposal are and stormwater, and	(h) irrigation and stock water, and	The benefits associated with the damming and storing of water within the bed of a river are recognised when:		the reliability of supply improves as a and	the damming and of water contributes

	efficient allocation and use of water.			
olicy P107: ramework for aking and using rater	use of water connectivity vater shall as described P (groundy), and I use of water allocation ame in the Plan, ar flows or v	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence insert (d) when schedule P changes; -ve effect on consent holders – 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
Policy P109: Lapse lates affecting vater takes	accordance with the Plan provisions. Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the	support	We support the use of water	
Policy P111: Water akes at minimum	resource consent. The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

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above minimum flows following a period of 10 days of continuous river levels at minimum flow	<u>As above</u>	Delete (c) (i)	
takes below minimum flows and lake levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface	water. A practical time lag should be allowed before take is reduced by 50%. As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
	Amend	esoddo	
11), with the exception that water is available below minimum flows: (c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water wels	Volicy P115: Authorising takes below minimum lows and lake evels	d) and (c) i	

	Retain	retain		(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made operative renewal of consent	to meet the chema
				The investment in infrastructure is considerable and time is required to implement changes	
	Support	support	-	amend	
	Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.		The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of:	(a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
	olicy P116: (eallocating water	Policy P117: Supplementary allocation amounts at flows above the nedian flow		Policy P118: Reasonable and fficient use	

olicy P119: nused water whe continued water for the form the form water for the form at filterage olicy P120: The at filtransfer of esource consents con ena	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of: (a) a capital expenditure programme linked to the purpose water is used for, and efficient use criteria identified in Schedule Q (efficient use). The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied. The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided:	Retain Retain retain retain	
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					Make this rule <u>restricted discretionary</u>	
					The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	
					amend	amend
(b) the transfer occurs within the same catchment management unit, and	(c) the same or a lesser amount of water is being taken or used, and	(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and	 the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use). 		The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of
				<u>sules</u>	Rule R135: Seneral rule for aking, use, the samming and siverting water a discretionary	Rule R137; Farm thairy washdown

(b) the total take shall be no more than 70L peday per stock unit based on the maximum herd size on the property at any time	during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and Note	Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136. In respect of condition (b) the Wellington Regional	Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	Delete Controlled and make this rule a <u>permitted</u> activity	retain	
(b) delete words after "property." Leaving this in is anti growth and development and not in the best interests	of the walfaraba			Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled		
				amend	support	
farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:	(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.	In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	
id milk-cooling ater – permitted stivity				Tule R143: Temporary water Sermit transfers— controlled activity	Fule R144: Transferring water sermits – restricted liscretionary ctivity	<u> Uther methods</u>

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vairarapa water sces	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend sto ecology, so of the ement 7.7. The limited	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
viethod M18: Water use groups	Wellington Regional Council will: (a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and	Support groups, or takes and and groups to fing during r when the allocated,	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	(c) provide, where available, accurate technical information to assist user groups.	available, iformațion		
Vethod M19: Water nanagement (d)	(d) promoting alternatives use of water races, and	s to the amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Method M28: Development of good management practice guidelines.	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	to support including relevant the	good method esp. the use of the words "collaboration with industry"	refain

	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
Vhaitua Vhaitua Volicy R.P3: Cumulative effects on river reaches of allocating water	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects – <u>that are measured</u> on aquatic
Figures 7.3 – 7.8	Water allocation amounts	Oppose	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u> Tables 7.3 – 7.5</u>	Surface and groundwater allocation amounts	oppose	in these tables may change significantly The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation currently consented. Consideration of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identified

Needs empirical calibration by GW	Remove sentence the model must reliably predict annual irrigation volume within an accuracy of 15% Add after field validated model – for Wairarapa conditions	(a) add after 80% - where practicable.
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	irrigators with lower efficiency may be more sultable for specific crops and farming situations. Case by case systems need to be assessed
esoddo	Amend	amend
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following	(a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.
inedules shedule P: assifying and anaging oundwater and irface water onnectivity	chedule Q: !easonable and fficient use criteria	

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows. Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river flows. Typically, the reduction in water take that may be required will be half the consented amount. Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by a water user group. In other rivers, stepdown allocations may be agreement or such a group, or in the absence of agreement or such a group, may be implemented by the Wellington Regional Council.						
chedule R:	tepdown Rocations					

Table R1: Stepdown allocations for rivers in the Ruamāhanga River catchment

River	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Wanagement point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
!	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Stephen Hammond

Submitter Number:

S414

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON REGIONAL CONNEC Te Pane Matus Tsiao

Freepost 3156

Wellington Regional Council

Wellington F PO Box 116 Wellington 6	46	meil					
Your details			······································	***************************************		ŽIÚCT	(015
Full name:	Leo\	√ollebregt)	a Pilling and American and the special paper subject to a second and the second		HE SELEC	ű·
Organisation name	(if applicab	ole): Wairara		r User's Inc. So			ODW
Address for service);	Leo Vollebregt					- 10*"
	*****************	235 Pahautea I	Road, RE	01,	MrF8 87 (**********************************		
		Featherston					
Telephone no's:	Work:	063088405	Home:	063088405	Cell:	0272588405	
Contact person:		Leo Vollebregt					
Address and teleph	none no (if e	different from above):	ar.a.a.v a 1000				
We will send you u	al Council h pdates on t	as a preference for provi he process, information a receive communication vi	and provide v	tion about the Propos rou with details of any	ed Natural I meelings a	Resources Plan via email. and the hearing. Please tick	
Email address:	Irvoll	@xtra.co.nz	aa kari karru kaaasi siri qiisha kaqa gga	v b p-b-land state - WAs div s produce produces and a size a size a size a size a			
Trade competition	1	**************************************	· · · · · · · · · · · · · · · · · · ·				
Yes I/we could no go straight to 'You			dition throug	h this submission [If yo	ou ticked this bo	ox, delete the rest of this section and	
☐ I/we could ga	in an adva	nlage in trade competitio	n through thi	s submission			
lf you could (gain an adv	antage please complete	one of the fo	llowing:			
□l/w	e are direc	ally affected by an effect of	of the subject	I matter of my submis	sion that ad	versely affects the	

Di/we are directly affected by an effect of the subject matter of my submission that adversely environment, and does not relate to trade competition or the effects of trade competition. Dl/we are not directly affected by an effect of the subject matter of my submission that adversely affects the environment, and does not relate to trade competition or the effects of trade competition. Your submission The specific provisions of the Proposed Natural Resources Plan that this submission relates to are: Please continue on separate sheet(s) - an excel spreadsheet of all of the proposed plan provisions is available online www.gw.govt.nz/regional-plan-review The specific provision of the Proposed My submission on this ☐ I support the provision Natural Resources Plan that my submission provision is. -> ☐ I oppose the provision relates to is (please specify the provision/ ☐ I wish to have the specific provision amended section number): Reasons for my our submission is attached to this details form submission: . 🧇 I seek the following decision from WRC (give precise datails):

Attenda	ance and wish to be heard at hearing(s)						
	We do wish to be heard in support of my/our submission lote: This means that you wish to speak in support of your submission at the hearing(s).	.]					
[N	We do not wish to be heard in support of my/our submission lote: This means that you cannot speak at the hearing. However, you will still retain you relington Regional Council to the Environment Court.]	ur right to a	ppeal any decision made by the				
☐ If others make a similar submission, I will consider presenting a joint case with them at a hearing.							
Signatu	[Person making submission or person authorised to sign on hehalf of person making submission. NB. Not required if making an electronic submission]	Date:	20/10/2015				

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

CLO

Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

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Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

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Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

Provision Text	, w	Support/ Oppose/ Amend	Reasons	Relief sought
Category A groundwat er (directly connected) Category B groundwat er (not directly connected) Category C groundwat er (not directly connected) Category C groundwat er (not directly connected)	Groundwater directly connected to surface water at the locations generally shown in chapter 7; Figures 8.1 and 8.2 in chapter 8; and 7.9 in chapter 7; Figures 8.2 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater or category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water allocations generally described in Table 7.5 in chapter 10. Taking water from category B groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category A, B and C groundwater need to be robust, and a mechanism or process must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B. at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Wailhenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers	Ground water will be categorised A or B or C once GVV has field verified its connectivity with surface water and performed an empirical calibration of the mode!

iroundwater Ca irectly car onnected to co urface water su legionally e ignificant	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to the groundwater allocation		effects to this take at low flows indicating boor relation of the takes to the river.	
	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
	the local authority wastewater and stormwater networks, systems and wastewater treatment plants	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Jnused water WI am am properties in an	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8 The per an and tra	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"
Objective O25 (c) To	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	esoddO	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

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able 3.6 roundwater irectly connected	lim Nitrate concentr effects on groun on aquatic plant in connected su	improved over time to meet that objective. Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies.	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
Objective O52	The efficiency of improved and m by means of: (a) (b) (c) (d)	The efficiency of allocation and use of water is improved and maximised through time, including by means of: (a) efficient infrastructure, and including irrigation, domestic municipal and industry practices, and (b) maximising reuse, recovery and recycling of water and contaminants, and (d) enabling water to be transferred between users, and transferred between users, and inver beds.	amend	Increasing water allocation allows for growth. (a) to (e) are good means to the objective. There needs to be the possibility of storage in stream	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) enabling storage within the bed of a river
Policy P6: Synchronised sxpiry and review lates	Resource consents common expiry or sub-catchment, if.	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if: (a) the affected resource is fully allocated or over-allocated, or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) <u>consents will run for a period of 25 years</u>

	Add diffuse contaminants to (b)	retain	retain				
	(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	We are pleased to see inigation get a special mention.					
	Amend	support	support				
(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.	(b) treatment, dilution and disposal of wastewater and stormwater, and	(ħ) irrigation and stock water, and	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	(c) there are significant social and economic benefits for the region, and	(d) water remains available for multiple in-stream and out of stream uses concurrently, and	(e) the reliability of water supply improves as a result, and	(f) the damming and storage of water contributes to the
	Policy P7: Uses of and and water (b) and (h)		Solicy P11: Instream water storage				

		efficient allocation and use of water.			
olicy P107: ramework for aking and using rater	The framework recognises: (a) (b)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and (b) the take and use of water does not exceed allocation amounts provided for in the Plan, and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence losert (d) when schedule P changes: -ve effect on consent holders 10 year lead in time to reflect cost. +ve effect - the water availability should be released immediately."
	©	minimum flows or water levels are managed in accordance with the Plan provisions.			
Policy P109: Lapse tates affecting vater takes	Resource conse given effect to w commencement justified due to t activity. For the effect to" include water meter or f of the water in a	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the	support	We support the use of water	
Policy P111: Water akes at minimum	resource consent. The take and use flows or water lev water levels in the	resource consent. The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

minimum flows: (d) category A groundwater which shall be required to above which shall be required to above that the species and minimum flows, and mortal crops and maize) for the species, animal flower crops and maize) for the sature species, animal flower crops and maize) for the sature species, animal flower crops and maize) for the sature species, animal flower crops and maize) for the sole provided: (d) category A groundwater with Policy P108. (d) category A groundwater water A practical time lag should be allowed before take is reduced by 50%. As above water A practical time lag should be allowed before take is reduced by 50%. As above water A practical time lag should be allowed before take is reduced by 50%. As above reduced to the effects of moving from a crease take position to 50% reduction in takes are available for deays of pasture species, animal fooder crops and maize) for the sole crops and maize) for the sole crops and maize) for the sole crops and maize) from the water shall only be available five days of pasture species, animal fooder crops and maize) from the water shall only be available from the species, animal fooder crops and maize) from species, animal fooder crops and where are available or accessible, and	above minimum flows following a period of 10 days of continuous river levels at minimum flow	As above	Delete (c) (i)	
nts in water all or the oof the obove only death only days after flow take are where citical ses of ble or	takes below minimum flows and lake levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep roofstock alive during prolonged low water levels	
		Amend	esoddo	
1< >	11), with the exception that water is available below minimum flows: (c)as authorised by resource consents in accordance with Policy P108.	category A groundwa which shall be required reduce the take by 50% of i amount consented abo minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	the water shall be available five (120 hours) minimum cessation restrictions imposed and wo no pradaternative source water are availate accessible, and

Retain	retain	(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan-being-made-operative renewal of consent to meet the criteria.
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
olicy P116: !eallocating wafer	Policy P117: Supplementary allocation amounts at flows above the nedian flow	Solicy P118: Reasonable and sflicient use

	operative to meet the criteria, and		
olicy P119: nused water	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of: (a) a capital expenditure programme linked to the purpose water is used for and	Support	Retain
	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).		
olicy P120; faking water for storage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	 Retain
olicy P128: Fransfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided:	Support	refain
	(a) the adverse effects of the take and use of transferred water are the same or less, and		

	(q)	the transfer occurs within the same catchment management unit, and			
	<u>(</u>)	the same or a lesser amount of water is being taken or used, and			
	(b)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(a)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
<u> </u>					
Rule R135; Seneral rule for aking, use, samming and liverting water riscretionary activity	The damming otherwise cont the Resource I permitted, cont discretionary, r activity is a dis-	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137: Farm tairy washdown	The take and to body (other the Rule R138) or	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

farm dairy washdown and milk cooling on a dairy milking platform; as a permitted activity, provided the following conditions are met: (b) delete words after " property." Leaving this in is anti growth and development and not in the best interess of the Wairarapa (b) the total take shall be no more than 70L per day per stock unit based on the maximum heaf size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum heaf size on the property using information obtained from the property water than one year is a confulloid activity, provided the following conditions are met: The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:		Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	Delete Controlled and make this rule a permitted activity	refain	
Ψ = > 0 Φ = -	(b) delete words after " property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa		Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled		
farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met: (b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83. The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met: The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:			amend	noddns	
	farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met: (b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	

lethod M13: Vairarapa water aces	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
Method M18: Water use groups	Wellington Regional Council will: (a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and	0.50 (1) -5		
	(c) provide, where available, accurate technical information to assist user groups.			
Vethod M19: Water nanagement (d)	(d) promoting alternatives to the use of water races, and	e amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Vethod M28: Development of yood management practice guidelines.	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp, the use of the words "collaboration with industry"	retain

	Insert after - adverse effects – <u>that are measured</u> on aquatic		Change the allocation amounts to what is currently allocated or more if spare water has been identified e.
positive move which will have farmers moving forward in their practices with the reg. council??	Important that the effects are measured, not just modelled.	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation currently consented. Consideration of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.
	amend	Oppose	esoddO
implementation of policies which rely on good management practice to achieve desired environmental outcomes.	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	Water allocation amounts	Surface and groundwater allocation amounts
	<u>tuamahanga</u> <u>Vhaitua</u> Policy R.P3; Sumulative effects In river reaches of	Figures 7.3 – 7.8	<u>Fables 7.3 – 7.5</u>

Needs empirical calibration by GW	Remove sentence the model must reliably predict annual irrigation volume within an accuracy of 15% Add after field validated model – for Wairarapa conditions (a) add after 80% - where practicable,	
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual infigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed
esoddo	Amend	
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following criteria: (a) an irrigation application efficiency of	80%, and (b) demand conditions that occur in nine out of 10 years.
thedules thedule P: assifying and anaging oundwater and irface water onnectivity	chedule Q: .easonable and fficient use criteria	

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users					
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input	
Support with amendments							
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	al by						
chedule R: iuideline for	tepdown llocations						

Table R1: Stepdown allocations for rivers in the Ruamāhanga River catchment

River	Winimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Simon Campbell

Submitter Number:

S415

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON REGIONAL COUNCIL Te Pane Matus Tajao

To:

Freepost 3156 Wellington Regional Council PO Box 11646

Wellington 6142

BSS CARRELOSSES (SSSCOOL COMPER

Your details			ZTUCTZ
Full name: Leo Vollebi	<u>regt</u>		
Organisation name (if applicable):	Wairarapa V	Water User's Inc. Society	
Address for service: Leo	Vollebregt		
235	Pahautea Road	i, RD1,	Militarian interior di delevalati Barramana sano sa arramangana yang a yani singi di sigili disebuhat aram.
Fea	therston		
Telephone no's: Work: <u>063</u>	<u>088405</u> н	ome: <u>063088405</u> Ceil: (0272588405
Contact person: Leo \	/ollebregt	- 1949 Blander of Britanis Blander of American State of S	
Address and telephone no (if different f		White the state of	THE FAMILY AND ADDRESS OF THE STATE OF THE S
Electronic communication			
Wellington Regional Council has a pref We will send you updates on the proce here □ if you do not agree to receive o	ss, information and pro	formation about the Proposed Natural Resovide you with details of any meetings and fill.	ources Plan via email. the hearing. Please tick
Email address: Irvoll@xtra.	co.nz	, m a r managa mang an anangan mang punyan dan managa anu sa managa mana an an kana a wana (ananga, an anga panga pang	was from the control of the order and all the way and the second of the
Trade competition	MINUS		
(es I/we could not gain an advantage go straight to 'Your submission'	e in trade competition t	ihrough this submission (If you ticked this box, de	elete the rest of this section and
☐ I/we could gain an advantage in t	rade competition throu	gh this submission	
If you could gain an advantage p	lease complete one of	the following:	
		subject matter of my submission that adverso petition or the effects of trade competition.	sely affects the
		the subject matter of my submission that a pelition or the effects of trade competition.	dversely affects the
Your submission			
The specific provisions of the Propo Please continue on separate sheet(s) – an en www.gw.govt.nz/regional-plan-review	sed Natural Resourc xcel spreadsheet of all of	es Plan that this submission relates to a Tthe proposed plan provisions is available onlin	are: c
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this provision is →	☐ I support the provision	
relates to is (please specify the provision/ section number);	piovision 3	☐ I oppose the provision☐ I wish to have the specific provision :	amended
	Reasons for my submission: : →	our submission is attached	to this details form
	I seek the following decision from WRC (give precise details):		

Atte	ndance :	and wish to be heard at hearing(s)		
yes		o wish to be heard in support of my/our submission This means that you wish to speak in support of your submission at the hearing(s).]		
	[Note: T	o not wish to be heard in support of my/our submission This means that you cannot speak at the hearing. However, you will still retain your gron Regional Council to the Environment Court.]	right to a	ppeal any decision made by the
	If others	s make a similar submission, I will consider presenting a joint case with ther	m at a he	aring.
Sign	alure:	[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]	Dale:	20/10/2015

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

CLO-

Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

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George Ritchie

Stephen Hammond Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

Provision Text	xt	Support/ Oppose/ Amend		Relief sought
Category A groundwat er connected) Category B groundwat er (directly connected) Category B groundwat er (not directly connected) Category C groundwat er (not directly connected) Category B groundwat er (not directly connected)	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and 7.4 in chapter 7, Table 8.2 chapter 8 and 7.4 in chapter 7, Table 8.2 chapter 8 and 7.4 in chapter 7, Table 8.2 chapter 8 and 7.4 in chapter 7, Table 8.2 chapter 6 and 7.4 in chapter 6 considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2.7.9 in chapter 7, shown in Figures 7.2.7.9 in chapter 7,	amend	The categorisation of groundwater needs clanfication in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category aquifer a particular abstraction may be tapping. Since any conditions must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily niver levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B. at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Waihenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model

	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river	Add after treatment plantswater race networks and facilities for the irrigation of pasture and crops	retain	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"	Remove
effects to this take at low flows indicating poor relation of the takes to the river.	There is no definition of what directly connected means.	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water		Objective does not give enough value to the use and potential use of water.	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known
	amend	amend	support	amend	osoddo
Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.	category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	 the local authority wastewater and stormwater networks, systems and wastewater treatment plants 	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is
	iroundwater irectly onnected to urface water	tegionally ignificant nfrastructure*	Inused water	Objective O8	Objective O25 (c)

	improved	improved over time to meet that objective.			
able 3.6 roundwater irectly connected surface water	Nitrate concentrations do not cause effects on groundwater-dependent on aquatic plants, invertebrate or fin connected surface water bodies	Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
Objective O52	The efficiency of alloca improved and maximis by means of:	The efficiency of allocation and use of water is improved and maximised through time, including by means of:	amend	Increasing water allocation allows for growth.	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of:
	(a) effi	efficient infrastructure, and		(a) to (e) are good means to the objective.	(a) to (e) are good means to the objective.
	go inc mu pra	good management practice, including irrigation, domestic municipal and industry practices, and		There needs to be the possibility of storage in stream	Add (f) enabling storage within the bed of a river
	(c) ma	maximising reuse, recovery and recycling of water and contaminants, and			
	(d) end	enabling water to be transferred between users, and			
	(e) end	enabling water storage outside river beds.			
Solicy P6: Synchronísed sxpiry and review lates	Resource consents may be granted with a common expliy or review date within a where sub-catchment, if: (a) the affected resource allocated or over-allocations.	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if: (a) the affected resource is fully allocated or over-allocated, or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) consents will run for a period of 25 years

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		(a)						
		Add <u>diffuse contaminants to (b)</u>	retain	retain				
		(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	We are pleased to see irrigation get a special mention.					
	<u>.</u>	Amend	support	support				
(h) the every'se of the racourge	consent may is consent may is consent may it is solution to quality, quar within that w catchment.	(b) treatment, dilution and disposal of wastewater and stormwater, and	(h) irrigation and stock water, and	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	(c) there are significant social and economic benefits for the region, and	(d) water remains available for multiple in-stream and out of stream uses concurrently, and	(e) the reliability of water supply improves as a result, and	(f) the damming and storage of water contributes to the
		olicy P7: Uses of and and water (b) and (h)		Solicy P11: Instream water store store reco				

		efficient allocation and use of water.			
olicy P107: ramework for aking and using rater	The framework frecognises: (a) (b)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and (b) the take and use of water does not exceed allocation amounts provided for in the Plan, and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence evidence lnsert (d) when schedule P changes; -ve effect on consent holders – 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
	©	minimum flows or water levels are managed in accordance with the Plan provisions.			
olicy P109: Lapse lates affecting vater takes	Resource consengiven effect to wit commencement commencement justified due to the activity. For the preffect to" includes water meter or floof the water in acresource consent.	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	poddns	We support the use of water	
olicy P111: Water akes at minimum	The take and us flows or water le water levels in t	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

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above minimum flows following a period of 10 days of continuous river levels at minimum flow		As above	Delete (c) (i)	
takes below minimum flows and lake levels)(d) on restrictions	should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
		Amend	esoddo	
11), with the exception that water is available below minimum flows:	(c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water vels	∽	olicy P115: Authorising takes selow minimum lows and lake evels (d) and (c) i		

Refain	refain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made operative renewal of consent to meet the criteria.
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
olicy P116: !eallocating water	Supplementary subplementary allocation amounts at flows above the nedian flow	Solicy P118: Reasonable and Afficient use

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	operative to meet the criteria, and		
olicy P119: nused water	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of: (a) a capital expenditure programme linked to the purpose water is used for, and	Support	Retain
	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).		
Policy P120: Faking water for storage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	Retain
olicy P128: Transfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use of transferred water are the same or less, and	Support	retain

	(q)	the transfer occurs within the same catchment management unit, and			
	(9)	the same or a lesser amount of water is being taken or used, and			
	(p)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(e)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
<u> Rules</u>					
Rule R135: Seneral rule for aking, use, lamming and liverting water – liscretionary	The damming cotherwise control the Resource Nepermitted, control discretionary, negrivity is a disc	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137. Farm	The take and u body (other the Rule R138) or g	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the rollowing conditions are met. (b) the total take shall be no more the maximum heaf size on the property at any time during the three years prior to the maximum heaf size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional council holds a record of the maximum herd size on the property owner in compliance with a resource consent obtained under Rule R83. The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions are met. The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretioniary activity, provided the following conditions are met:	(b) the total take shall be no more than 70L peday per stock unit based on the maximum herd size on the property at any-time during the three-years-prior to the date-of public notification of the Proposed-Natural Resources-Plan (31.07.2015), and	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	Delete Controlled and make this rule a permitted activity	retain	والمسارعة والمسا
9 6 7 9 6 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	(b) delete words after "property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa		Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transfering water permits needs to be a permitted activity not controlled		
farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met: (b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83. The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met: The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:			amend	support	
	farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met: (b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	

Vairarapa water We aces Wish	/ellington Regio /airarapa distric naracterise the I nd the social, he /airarapa water ntions for the we anagement opti	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
Method M18: Water Wase groups	/ellington Region (a) (b)	Wellington Regional Council will: (a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and (b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	<u> </u>	provide, where available, accurate technical information to assist user groups.			
Method M19: Water nanagement (d)	(p)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to quantify costs and benefits of water races and explore alternatives
Method M28: Development of de yood management ru ractice guidelines.	Vellington Regio evelop practices iles) in collabor≀ ganisations and	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

	Insert after - adverse effects – <u>that are measured</u> on aquatic	Do not include figures 7.3 – 7.8 in the plan until categories have been verified Change the allocation amounts to what is currently allocated or more if spare water has been identified
positive move which will have farmers moving forward in their practices with the reg. council??	Important that the effects are measured, not just modelled.	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly. The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.
	amend	escoddo escoddo
implementation of policies which rely on good management practice to achieve desired environmental outcomes.	When allocaling river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	Water allocation amounts Surface and groundwater allocation amounts
	<u>Yuamahanga</u> Whaitua Policy R.P3; Sumulative effects In river reaches of allocating water	Figures 7.3 – 7.8

Needs empirical calibration by GW	Remove sentence the model must reliably predict annual irrigation velume within an accuracy of 15% Add after field validated model – for Wairarapa conditions (a) add after 80% - where practicable.	
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	
obbose	Amend	
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as rainfall variability and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following criteria: (a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.	
thedules shedule P: assifying and anaging oundwater and irface water nnectivity	chedule Q: :easonable and fficient use criteria	

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users						
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to	demonstrated as are the effects of	i destrictions	I nere also needs to be room for the Whaitua to have their input
Support with amendments								
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by	a water user group. In other rivers, stepdown allocations may be agreed by a water user group,	or in the absence of agreement or such a group, may be implemented by the Wellington Regional	Council.		
chedule R: suideline for	lepdown llocations					,		

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

River	Winimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Wanagement point
Waipoua River	250		300	Mikimiki Bridge
Waingawa Ríver	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Bryan Tucker

Submitter Number:

S416

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

Greater WELLINGTON
REGIONAL COUNCIL
TO Pano Matua Talao

To:

Freepost 3156 Wellington Regional Council PO Box 11646

Wellington 6142

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Your details	*************************************		Z OCT 2015
Full name: Leo Vollebr	regt		FEVEN 49
Organisation name (if applicable):		Vater User's Inc. Society	
Address for service: Leo	Vollebregt		and the same of th
235	Pahautea Road	, RD1,	interfect of the second confidence was a second description to the party of the second description and the second
Fea	therston		4 7 40 70 10 10 10 10 10 10 10 10 10 10 10 10 10
Telephone no's: Work: <u>063</u>	088405 на	ome: <u>063088405</u> C	ell: 0272588405
Contact person: Leo \	/ollebregt		
Address and telephone no (if different f	rom above):		
Electronic communication Wellington Regional Council has a pref We will send you updates on the proce.	erence for providing in	formation about the Proposed Natu	iral Resources Plan via email.
here \square if you do not agree to receive co	ommunication via ema	il.	go and the nearing, t lease tick
Email address: Irvoll@xtra.	co.nz	ma , was base sawa sa garage y gas all de prove head desiration and order to be surely and a service medical se	the first and amount to demand required the states and a reduction of the states and the states of t
Trade competition	· · · · · · · · · · · · · · · · · · ·	W. C.	1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-
yes II /we could not gain an advantage go straight to "Your submission"	e in trade competition t	hrough this submission (If you ticked to	his box, delete the rest of this section and
☐ I/we could gain an advantage in t	rade competition throu	igh this submission	
If you could gain an advantage p	lease complete one of	the following:	
		subject matter of my submission that setition or the effects of trade comp	
		the subject matter of my submissio etition or the effects of trade comp	
Your submission			
The specific provisions of the Propo Please continue on separate sheet(s) - an ex www.gw.govt.nz/regional-plan-review			
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this provision is.	☐ I support the provision	
relates to is (please specify the provision/	provision is. 7	☐ I oppose the provision☐ I wish to have the specific pro	ovision amended
sedion number):	Reasons for my submission:		ached to this details form
	I seek the following decision from WRC (give precise details):		

Atte	ndance a	and wish to be heard at hearing(s)		
yes		wish to be heard in support of my/our submission his means that you wish to speak in support of your submission at the hearing(s).]		
	[Note: T	o not wish to be heard in support of my/our submission his means that you cannot speak at the hearing. However, you will still retain your ton Regional Council to the Environment Court.]	right to app	eal any decision made by the
	If others	s make a similar submission, I will consider presenting a joint case with then	n at a hear	ing.
Sìgni	ature:	[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]	Date:	20/10/2015

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

€

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
Category A groundwat er (directly connected) Category B groundwat er (not directly connected) Category C groundwat er (not directly connected) Category C groundwat er er (not directly connected)	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.7, 8 and 7.9 in chapter 8; and Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water allocations generally described in Table 7.5 in chapter (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation.	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category A, B and C groundwater need to be robust, and a mechanism or process must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B.at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Waihenga river level consent holders unknowingly resumed taking water even though the river had	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an emplifical calibration of the model

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
tegionally ignificant nfrastructure*	the local authority wastewater and stormwater networks, systems and wastewater treatment plants	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Inused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"
Objective O25 (c)	To safeguard aquatic ecosystem health and marine area: marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	Oppose	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

x

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able 3.6 roundwater irectly connected surface water	improved over time objective. Nitrate concentrations do not caus effects on groundwater-dependent on aquatic plants, invertebrate or fin connected surface water bodies	improved over time to meet that objective. Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
Objective O52	The efficiency of allcimproved and maxim by means of: (a) e (b) g in n (c) n (d) e (e) e (e) e	The efficiency of allocation and use of water is improved and maximised through time, including by means of: (a) efficient infrastructure, and good management practice, including irrigation, domestic municipal and industry practices, and (c) maximising reuse, recovery and recycling of water and contaminants, and contaminants, and transferred between users, and transferred between users, and transferred between users, and transferred between users, and triver beds.	amend	Increasing water allocation allows for growth. (a) to (e) are good means to the objective. There needs to be the possibility of storage in stream	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) enabling storage within the bed of a river
Policy P6: Synchronised Expiry and review lates	Resource consents common expiry or resub-catchment, if: (a) the sub-catchment of the sub-cat	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if: (a) the affected resource is fully allocated or over-allocated, or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) <u>consents will run for a period of 25 years</u>

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		Add <u>diffuse contaminants to (</u> b)	retain	retain				
		(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	We are pleased to see irrigation get a special mention.					
		Amend	support	support				
	the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.	treatment, dilution and disposal of wastewater and stormwater, and	(h) irrigation and stock water, and	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	there are significant social and economic benefits for the region, and	water remains available for multiple in-stream and out of stream uses concurrently, and	the reliability of water supply improves as a result, and	the damming and storage of water contributes to the
	(q)	(b) treatment, wastewate	i (h)	The benefits asso storing of water w recognised when:	<u></u>	(b)	(e)	(f)
,		Policy P7: Uses of and and water (b) and (h)		Solicy P11: Instream water				

		efficient allocation and use of water.			
olicy P107: ramework for aking and using rater	The framework for recognises: (a) (b)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and (b) the take and use of water does not exceed allocation amounts provided for in the Plan, and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessarily.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence in schedule P changes; -ve effect on consent holders – 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
	(i)	minimum flows or water levels are managed in accordance with the Plan provisions.			
Policy P109: Lapse Jates affecting vater takes	Resource conserr given effect to wit commencement c justified due to the activity. For the preffect to includes water meter or flo of the water in accresource consent.	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	support	We support the use of water	
olicy P111: Water akes at minimum	The take and use flows or water lev water levels in the	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

above minimum flows following a period of 10 days of continuous river levels at minimum flow	<u>As above</u>	Delete (c) (i)	
takes below minimum flows and lake levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep roofstock alive during prolonged low water levels	
	Amend	esoddo	
11), with the exception that water is available below minimum flows: (c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water vels	olicy P115: Authorising takes below minimum lows and lake evels d) and (c) i		

	Retain		refain	(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan-being-made-operative renewal of consent	to meet the cnteria"
				The investment in infrastructure is considerable and time is required to implement changes	
	Support		support	amend	
	Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	and difficults on the affice when is over the bloom	from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of:	(a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
	olicy P116: eallocating water		Policy P117: Supplementary allocation amounts at flows above the nedian flow	olicy P118: Reasonable and officient use	

	operative to meet the criteria, and		
olicy P119: nused water	er allocated to an existing y be re-allocated to the sa isting resource consent ction rate is changed, only er can demonstrate how to used within four years, in	Support	Retain
	(a) a capital expenditure programme linked to the purpose water is used for, and		
	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).		
olicy P120; Faking water for storage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	Retain
Policy P128: Transfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided:	Support	retain
	(a) the adverse effects of the take and use of transferred water are the same or less, and		

	(q)	the transfer occurs within the same catchment management unit, and			
	<u> </u>	the same or a lesser amount of water is being taken or used, and			
	(b)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(e)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
Zules					
Rule R135: Seneral rule for aking, use, larming and liverting water – liscretionary	The damming or otherwise contrathe Resource Mermitted, contradiscretionary, no activity is a discretionary.	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137: Farm	The take and us body (other than Rule R138) or g	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

ater – permitted	milking platform is a permitted activity, provided the following conditions are met:		Leaving this in is anti growth and development and not in the best interests	(b) the total take shall be no more than /UL pe day per stock unit based on the maximum herd size on the property at any time
	the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan		Of the wall alapa	euring-the-three-years-phorto the date-of- public-notification-of-the-Proposed-Natural Resources-Plan (31.07.2015), and
	(51.07.2015), and Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.			Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136. In respect of condition (b) the Wellington Regional
	In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.			Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.
Rule R143: Emporary water permit transfers – controlled activity	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	amend	Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled	Delete Controlled and make this rule a permitted activity
tule R144: ransferring water permits – restricted liscretionary	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	support		retain
Other methods				

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Valrarapa water aces	Wellington Regic Wairarapa distric characterise the and the social, h Wairarapa water options for the w management op to:	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	I he economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cuitural values and economic values of the Wairarapa water races
Vethod M18: Water use groups	Wellington Regin (a) (b)	Welfington Regional Council will: (a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and (b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	©	provide, where available, accurate technical information to assist user groups.			
Vethod M19: Water nanagement (d)	(p)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to quantify costs and benefits of water races and explore alternatives
Vethod M28: Development of good management practice guidelines.	Wellington Regidevelop practice rules) in collabor organisations an	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

	Legal of the delice of the second constitution of		111111111111111111111111111111111111111	
	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
uamahanga Vhaitua Policy R.P3; Sumulative effects on river reaches of allocating water	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	insert after - adverse effects – <u>that are measured</u> on aquatic
Figures 7.3 – 7.8	Water allocation amounts	Oppose	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u> </u>	Surface and groundwater allocation amounts	obbose	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation currently consented. Consideration of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identiffec

Needs empirical calibration by GW	Remove sentence the model must reliably predict annual irrigation volume within an accuracy of 15% Add after field validated model – for Wairarapa conditions	
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	irrigators with lower efficiency may be more sultable for specific crops and farming situations. Case by case systems need to be assessed
obbose	Amend	amend
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following criteria:	(a) an irrigation application efficiency of 80%, and(b) demand conditions that occur in nine out of 10 years.
thedules shedule P: assifying and anaging oundwater and irface water nnectivity	chedule Q: !easonable and fficient use criteria	

consent when river flows are low, stepdown allocations consented may be included as conditions of resource consent when rivers approach minimum flows. Support with locations or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduction in water take that may be required will be half the consented amount. Stepdown allocations may required to cease or be reduction in water take that may be required will be half the consented amount. Stepdown allocations ror specific rivers are identified in Table R1 unless otherwise agreed by a water user group, or in the absence of agreement or such a group. The effects of volved in water water user group. The effects of volved in water is cleaned up the minimum flow ander users group. The effects of volved in water is cleaned up the minimum flow and the wellington Regional Council. There also not be reduced as flows approach minimum flow and to the reduction in water take that may be required will be half the consented amount. Stepdown allocations may require a sheet to cease or detection in water take that may be required will be half the consented amount. Stepdown allocations may be agreed by a water user group. The effects of procedule and good use of groups of restrictions are required with water users. There also step of the will be provided in an absence of agreement or such a group. The effects of own flows needs to be room for the

Table R1: Stepdown allocations for rivers in the Ruamāhanga River catchment

	Viinimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa Ríver	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach]	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Matthew Honeysett

Submitter Number:

S417



Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON REGIONAL COUNCIL Te Pano Matus Talao

To:

Freepost 3156 Wellington Regional Council PO Box 11646

Wellington 6142

SESTEMBLE STREET ! RESIDENT PROPERTY.

Your details	**************************************					Ž T ÚĆT	20
Full name:	Leo Volleb	regt		radio dell'organizzo delle un un'esta delle di un'esta della delle delle delle delle delle delle delle delle d		PROGRE	
Organisation name (i	f applicable):	Wairara	pa Wate	r User's Inc. S	ociety		tO
Address for service:	Lec	Vollebregt					-
	235	Pahautea F	Road, RD	1,			
	Fea	atherston		***************************************			
Telephone no's:	Work: <u>06</u>	3088405	Home:	063088405	Cell:	0272588405	
Contact person:	Leo	Vollebregt	*********************				
Address and telepho	ne no (if different	from above):	end-1-10-11		***************************************	aminin and a factor of galley a spatial depth and the second and an experience of the second and	
Electronic commun Wellington Regional (We will send you und	Council has a pre	eference for provicess. Information a	ling informati	ion about the Propo	sed Natural F	Resources Plan via email.	
here 🗆 if you do not a	agree to receive o	communication vi	a email.		y mooningo is	no tro hearing, reado por	
Email address:	lrvoll@xtra	.co.nz		And the televist to see a vertice requires and an experience and	,		
if you could ga □l/we enviror □l/we	in an advantage are directly affect ment, and does are not directly	not relate to trade affected by an eff	one of the fole f the subject competition ect of the sub	lowing: matter of my submi or the effects of tra	de competition ubmission that	on. at adversely affects the	
Your submission				······			
The specific provisi Please continue on sepa www.gw.goyt.nz/regio	arate slicet(s) - an						
The specific provision of Natural Resources Plan	The Proposed that my submission	My submission on provision is	1	I support the provis			
relates to is (please spe section number):				wish to have the sp		on amended	
		Reasons for my submission:	0	ur submission	is attach	ed to this details for	าา
:							
		I seek the followin decision from WR (give precise deta	Č				

	Atte	ndance	and wish to	be heard at	hearing(s)							
[yes		wish to be h					he hearing(s).]			
		[Note: T	o not wish to This means that ton Regional C	you cannot s	eak at the h	earing. Howe		still retain you	ir right to t	ıppeal aı	ny decision made by	the
		If others	s make a sim	ilar submissi	on, I will co	nsider prese	enting a joint	case with the	em at a he	earing.		
	Sign	ature:					sign quired if mak	ing an	Daie:	-	20/10/2015	

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

Leo Vollebregt

CLO-

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

€

41

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

,	Text	Oppose/ Amend		
Pfinitions				
enimudis		amend	The categorisation of groundwater needs	Ground water will be categorised A or B or C once
Category A aroundwat	Groundwater directly connected to surface water at the locations generally shown in		clarification in the definitions. The connectivity between various around	GW has field verified its connectivity with surface water and nerformed an empirical calibration of the
Ġ.	Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in		water takes has not been verified and	model
	and Figure 10.1 and 10.2 in chapter 10.		amongst the users there is significant	
groundwat	Taking water from Category A		acubit. Expecting users to individually verify as	
er (directly	groundwater is considered to be surface water allocation.		consents are renewed is expensive and	
connected)			potential use of water is restricted understantly impecessarily impacting on farm	
Category B	Groundwater not classified as either		businesses severely.	
groundwat	category A groundwater or category C			
er (not	directly connected to surface water through	÷	The definitions of Category A, B and C	
connected	applying the tests in Schedule Q (efficient		groundwater need to be robust, and a mechanism or process must be provided	
	use). Category B groundwater (directly		for identifying which Category aquifer a	
Category C	connected) is at the locations generally		particular abstraction may be tapping.	
groundwat	described in Tables 7,3 and 7.4 in chapter		Since any conditions must be related to	
ē	chapter 10. Taking water from category B		the 'effects', it would seem that Category	
	groundwater (directly connected) is	,	demonstrate a strong and consistent	
	considered to be surface water allocation.		relationship between daily niver levels and	
	Groundwater not classified as either		daily groundwater levels. If not then	
	category A groundwater or category C	-as	refevance. There should also be a clear	
	groundwater and which is defined as being		and quantifiable difference between	
	not directly connected to surface water		Category A & B.at present the	
	(efficient use). Cafegory B proundwater		management approach' appears to be	
	(not directly connected) is at the locations		are demonstrably different in their	
	generally described in Table 7.5 in chapter		response to river levels.	
	7, Table 8.3 in chapter 8 and Table 10.3 in	-A		
	aroundwater (not directly connected) is		In February 2015 work undertaken in the	
	considered to be groundwater allocation.		recorder interfered with readings so that	
			consent holders unknowingly resumed	
-	Groundwater not directly connected to		taking water even though the river had	
	Surface water at the locations generally shown in Figures 7.2.7.9 in chapter 7		reached minimum flow. Observers	
	3110 Wil III 1 Iguico 1.5-1.5 III Giaptel 1,		working by the liver reported no adverse	

			water body or coastal marine area is	
	current water quality levels are known		marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh	
Remove	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Oppose	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:	Objective O25 (c)
the social, <u>agricultural, industrial,</u> cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"	Objective does not give enough value to the use and potential use of water.	amend	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	Objective O8
retain		support	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	Jnused water
Add after treatment plants water race networks and facilities for the irrigation of pasture and crops	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	amend	the local authority wastewater and stormwater networks, systems and wastewater treatment plants	legionally ignificant nfrastructure*
Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river	There is no definition of what directly connected means.	amend	category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	iroundwater irectly onnected to urface water
	effects to this take at low flows indicating poor relation of the takes to the river.		Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.	
				,

able 3.6 Nitrate concentrations do not cause unacceptable roundwater effects on groundwater-dependent ecosystems or irectly connected on aquatic plants, invertebrate or fish communities in connected surface water bodies	t cause unacceptable indent ecosystems or te or fish communities odies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
Objective O52 The efficiency of allocation and use of water is improved and maximised through time, including by means of: (a) efficient infrastructure, and	ocation and use of water is mised through time, including efficient infrastructure, and	amend	Increasing water allocation allows for growth. (a) to (e) are good means to the objective.	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective.
(b) good manage including irrig municipal practices, and	good management practice, including irrigation, domestic municipal and industry practices, and		There needs to be the possibility of storage in stream	Add (f) enabling storage within the bed of a river
(c) maximising reuse and recycling of contaminants, and	ng reuse, recovery voling of water and ants, and			
(d) enabling transferred	enabling water to be transferred between users, and			
(e) enabling w iver beds.	enabling water storage outside river beds.			
Policy P6: Synchronised common expiry or review date within a whaitua or sxpiry and review sub-catchment, if: lates (a) the affected resource is fully allocated or over-allocated or	rmay be granted with a review date within a whaitua or the affected resource is fully allocated or over-allocated or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) <u>consents will run for a period of 25 years</u>

,					
	(q)	the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.			
olicy P7: Uses of and and water (b) and (h)	(b) treatment, wastewate	treatment, dilution and disposal of wastewater and stormwater, and	Amend	(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	Add <u>diffuse contaminants to (b)</u>
	(h) irriç	(h) irrigation and stock water, and	support	We are pleased to see irrigation get a special mention.	retain
Policy P11: Instream water	The benefits asso storing of water w recognised when:	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	support		retain
	(Ö)	there are significant social and economic benefits for the region, and			
	(p)	water remains available for multiple in-stream and out of stream uses concurrently, and			
	(e)	the reliability of water supply improves as a result, and			
	(J)	the damming and storage of water contributes to the			

		efficient allocation and use of water.			
olicy P107: ramework for aking and using rater	The framework for recognises: (a) (b)		amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence linsert (d) when schedule P changes; -ve effect on consent holders – 10 year lead in time to reflect cost. +ve effect - the water availability should be released immediately."
	(9)	minimum flows or water levels are managed in accordance with the Plan provisions.			
Policy P109: Lapse lates affecting vater takes	Resource consengiven effect to wit commencement commencement justified due to the activity. For the prefect to includes water meter or floo of the water in acresource consent	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	topport	We support the use of water	
Policy P111: Water akes at minimum	The take and use flows or water le water levels in the	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

above minimum flows following a period of 10 days of continuous river levels at minimum flow	<u>As above</u>	Delete (c) (i)	
takes below minimum flows and lake levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
	Amend	obbose	
11), with the exception that water is available below minimum flows: (c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water wels	Policy P115: Authorising takes Selow minimum lows and lake evels	.d) and (c) i	

	Retain	retain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the plan being-made-eperative renewal of consent to meet the criteria".
			The investment in infrastructure is considerable and time is required to implement changes
	Support	support	amend
	Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing resource consents have a period of four years from the date of the plan being made
	olicy P116: !eallocating water	Policy P117: Supplementary allocation amounts at flows above the nedian flow	Policy P118: Reasonable and Afficient use

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	operative to meet the criteria, and		
olicy P119: nused water	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of:	Support	Retain
	(a) a capital expenditure programme linked to the purpose water is used for, and		
	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).		
Policy P120: Faking water for storage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	Retain
Policy P128: Fransfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided:	Support	retain
	(a) the adverse effects of the take and use of transferred water are the same or less, and		

	(q)	the transfer occurs within the same catchment management unit, and			
	(0)	the same or a lesser amount of water is being taken or used, and			
	(p)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(e)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
<u> </u>					
Rule R135: Seneral rule for aking, use, lamming and liverting water - liscretionary	The damming cotherwise contractive Resource Nepermitted, contractionary, neactivity is a disc	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137: Farm	The take and un body (other that Rule R138) or g	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

				other methods
retain		support	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	Rule R144: Transferring water sermits – restricted liscretionary ctivity
Delete Controlled and make this rule a <u>pemitted</u> activity	Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled	amend	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	tule R143: Temporary water Sermit transfers— Controlled activity
Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.			Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	
(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at-any-time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and Note	(b) delete words after "property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa		farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met: (b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	id milk-cooling ater – permitted ativity }

segional Council was support was voluntary as water users manage all support was assist with voluntary of restrance and and		Support		
(c) provide, where available, accurate technical information to assist user groups.	ere available, ical information roups.		Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
Method M19: Water (d) promoting alternatives nanagement (d) use of water races, and	to the	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Veilington Regional Council will continue to develop practices, procedures and tools (including yood management rules) in collaboration with industry, other relevant organisations and stakeholders to support the		support	good method esp. the use of the words "collaboration with industry"	retain

	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
tuamahanga Whaitua Policy R.P3: Sumulative effects on river reaches of allocating water	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects – <u>that are measured</u> on aquatic
-igures 7.3 – 7.8	Water allocation amounts	Oppose	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u>Fables 7.3 – 7.5</u>	Surface and groundwater allocation amounts	esoddO	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation currently consented. Consideration of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identified

(a) add after 80% - where practicable,	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed	amend	(a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.	
Remove sentence t he model must reliably predict annual irrigation volume within an accuracy of 15% Add after field validated model – <u>for Wairarapa</u> conditions	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	Amend	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following criteria:	chedule Q; !easonable and fficient use criteria
Needs empirical calibration by GW	Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	esoddo		thedule P: assifying and anaging oundwater and Irface water nnectivity
				selnbed

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by	a water user group. In other rivers, stepdown allocations may be agreed by a water user group,	or in the absence of agreement of such a group, may be implemented by the Wellington Regional Council.	
chedule R: uideline for	tepdown Ilocations					

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

River	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Rod Sutherland

Submitter Number:

S418

#1530376

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON
REGIONAL COUNCIL
TO FANO MATUR TAIRO

To: Freepost 3156
Wellington Regional Council
PO Box 11646
Wellington 6142

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Your details			Ž OCT 2015
Full name: Leo Vollebi			SECENCE
Organisation name (if applicable):	Wairarapa V	/ater User's Inc. Society	4.10
Address for service: Leo	Vollebregt		
235	Pahautea Road	DD4	
Fea	therston	2	
Telephone no's: Work: <u>063</u>	088405 но	me: <u>063088405</u> Ce	ell: 0272588405
Contact person: Leo	/ollebregt	ed dissorts revised framewiss as as and days consuming by installable beginning to provide backs were as a pass	
Address and telephone no (if different t			
Electronic communication		Average til til en ut skallen som en	
Wellington Regional Council has a pref We will send you updates on the proce here □ if you do not agree to receive c	ss, information and pro onimunication via emai	vide you with details of any meeting I.	gs and the hearing. Please tick
Email address: Irvoll@xtra.	.co.nz	- 18 18 18 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ik kalluni, kaiju ajak ajahujujujujujuju ka kajub uri ona opinum u namunum ka kalka 200 kainna ku kain
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roade compension			
I/we could not gain an advantage go straight to Your submission]	e in trade competition th	arough this submission (If you ticked th	is box, delete the rest of this section and
☐ I/we could gain an advantage in t	trade competition through	gh this submission	
lf you could gain an advantage p	lease complete one of	the following:	
		ubject matter of my submission that etition or the effects of trade compe	
		he subject matter of my submission etition or the effects of trade compe	
Your submission			
The specific provisions of the Propo Please continue on separate sheet(s) – an e www.ew.govt.nz/regional-plan-review	osed Natural Resource xcel spreadsheet of all of	es Plan that this submission relat the proposed plan provisions is availab	ies to are: de online
The specific provision of the Proposed	My submission on this	☐ I support the provision	
Natural Resources Plan that my submission relates to is (please specify the provision/	provision is>	☐ I oppose the provision☐ I wish to have the specific pro	vision amended
section number):	Reasons for my		
	submission: : ->	our submission is atta	ched to this details form
	I seek the following		
	decision from WRC (give precise details): →		
	·	·	

	Atte	ndance	and wish to	be heard at	hearing(s)						
/	yes			neard in supp t you wish to				the hearing(s).	}			
	B	[Note: T	his means the	be heard in it you cannot s Council to the	peak at the l	icaring, How		still retain you	r right to a	ppeal a	ny decision made by tl	he
		If others	s make a sin	illar submiss	ion, I will co	nsider prese	enting a joint	case with the	em at a he	aring.		
	Sign	ature:		•			sign equired if mak	ling an	Date:	TRACE COM.	20/10/2015	***********

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

CLO

Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

^

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
Category A groundwat er Grategory B groundwat er (directly connected) Category B groundwat er (hot directly connected) Category C groundwat er proportion on the connected of th	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected to surface water allocation. Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7, shown in Figures 7.2-7.9 in chapter 7, shown in Figures 7.2-7.9 in chapter 7,	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category aquifer a particular abstraction may be tapping. Since any conditions must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and quantifiable difference between conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B. at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Wailhenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
tegionally ignificant nfrastructure*	the local authority wastewater and stormwater networks, systems and wastewater treatment plants	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Inused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework."
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	escoddo	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	impr obje	improved over time to meet that objective.	o many	Incolictic and non defined	nitrate in groundwater should not exceed human
able 3.0 roundwater irectly connected 3 surface water	Nurate concentrations do not caus effects on groundwater-dependent on aquatic plants, invertebrate or fin connected surface water bodies	Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	alliend	The actual numerical amount needs to be stated	drinking water standards, i.e. 11.3
Objective O52	The efficiency of a improved and max by means of:	The efficiency of allocation and use of water is improved and maximised through time, including by means of:	amend	Increasing water allocation allows for growth.	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of:
	(a)	efficient infrastructure, and		(a) to (e) are good means to the objective.	(a) to (e) are good means to the objective.
	(q)	good management practice, including irrigation, domestic municipal and industry practices, and		There needs to be the possibility of storage in stream	Add (f) enabling storage within the bed of a river
	<u></u>	maximising reuse, recovery and recycling of water and contaminants, and			
	(p)	enabling water to be transferred between users, and			
	(e)	enabling water storage outside river beds.			
Policy P6: Synchronised expiry and review	Resource consents common expiry or r sub-catchment, if:	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if:	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years	Retain Add (c) <u>consents will run for a period of 25 years</u>
iates	(a)	the affected resource is fully allocated or over-allocated, or		Due to the significant investment in infrastructure a long consent is necessary.	

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		Add <u>diffuse contaminants to (b)</u>	retain	retain				
		(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	We are pleased to see irrigation get a special mention.					
		Amend	support	support				
}	(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.	(b) treatment, dilution and disposal of wastewater and stormwater, and	(h) inigation and stock water, and	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	(c) there are significant social and economic benefits for the region, and	(d) water remains available for multiple in-stream and out of stream uses concurrently, and	(e) the reliability of water supply improves as a result, and	(f) the damming and storage of water contributes to the
,		olicy P7: Uses of and and water (b) and (h)		Solicy P11: Instream water storage				

		efficient allocation and use of water.			
olicy P107: ramework for aking and using rater	The framework trecognises: (a)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on fam businesses and the district and regional	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence insert (d) when schedule P changes; -ve effect on consent holders — 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
	<u> </u>	mot exceed allocation amounts provided for in the Plan, and minimum flows or water levels are managed in accordance with the Plan provisions.		economies severely and unnecessarily. An empirical calibration is necessary.	
Policy P109: Lapse tates affecting vater takes	Resource consent given effect to wit commencement distiffed due to the activity. For the prefect to "includes water meter or flo of the water in accresource consent.	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	support	We support the use of water	
olicy P111: Water akes at minimum	The take and us flows or water le water levels in	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

above minimum flows following a period of 10 days of continuous river levels at minimum flow		<u>As above</u>	Delete (c) (i)	
takes below minimum flows and lake levels)(d) on restrictions	should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
		Amend	esoddo	
11), with the exception that water is available below minimum flows:	(c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water vels	~	Policy P115: Authorising takes Selow minimum lows and lake evels (d) and (c) i		

Refain	retain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the plan-being-made-operative renewal of consent to meet the criteria"
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
olicy P116: :eallocating water	Policy P117: Supplementary allocation amounts at flows above the nedian flow	Policy P118: Reasonable and Afficient use

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	Retain	Retain	retain
	Support	Support	Support
operative to meet the criteria, and		The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use of transferred water are the same or less, and
	olicy P119: nused water	olicy P120: Faking water for itorage	Policy P128: Transfer of esource consents

	(g)	the transfer occurs within the same catchment management unit, and			
	<u> </u>	the same or a lesser amount of water is being taken or used, and			
	(b)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(e)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
<u> </u>					
Rule R135: Seneral rule for alking, use, samming and silverting water – siscretionary activity	The damming or otherwise contrathe Resource Mermitted, contradiscretionary, no activity is a discretionary.	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137: Farm	The take and us body (other than Rule R138) or g	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

the following conditions are met: (b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83. The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met: The transfer of the whole or part of a water permit for the take and use of water that does not meet that conditions are met:
Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83. The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met: The transfer of the whole or part of a water permit for the transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:

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retiou M 13. Vairarapa water aces	Wellington Region Wairarapa district characterise the Fand the social, he Wairarapa wafer options for the wairanagement options to:	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
Vethod M18: Water ise groups	Wellington Regional Council will: (a) support wate voluntary agn water users, the manage alloo support wate assist with wate assist with wate catchment is and	support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	<u> </u>	provide, where available, accurate technical information to assist user groups.			
Method M19: Water nanagement (d)	(p)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Method M28: Jevelopment of yood management practice guidelines.	Wellington Regio develop practices rules) in collabors organisations and	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

irs in the	ıred, İnsert after - adverse effects - <u>that are measured</u> on aquatic	little categories have been verified and to not include figures 7.3 – 7.8 in the plan until categories have been verified and to nounts	the allocated or more if spare water has been identified to allocated or more if spare water has been identified to allocated or more if spare water has been identified to allocated or more if spare water has been identified to allocated or more if spare water has been identified to allocated or more if spare water has been identified the inable.
positive move which will have farmers moving forward in their practices with the reg. council??	Important that the effects are measured, not just modelled.	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	
implementation of policies which rely on good management practice to achieve desired environmental outcomes.	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depietion from loss of river water to groundwater.	Water allocation amounts Oppose	Surface and groundwater allocation amounts Oppose
	<u>tuamahanga</u> <u>Vhaitua</u> Policy R.P3: Cumulative effects on river reaches of	igures 7.3 – 7.8	<u>Fables 7.3 – 7.5</u>

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n by GW Needs empirical calibration by GW various ground	ually verify as estricted on farm	odel must Remove sentence the model must reliably predict Jation volume annual irrigation volume within an accuracy of 15% 5." Unreasonable	e of dramatic ns. Add after field validated model – <u>for Wairarapa</u> strom the rest <u>conditions</u>	ected parties is	(a) add after 80% - <u>where practicable.</u>	ency may be crops and oy case systems
ose Needs empirical calibration by GW The connectivity between various ground	been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	end Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable	for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be	recognised. More consultation with affected parties is required.	pue	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed
esoddo		Imigation A resource consent annitication to take water for	irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and	climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual inigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following	criteria: (a) an irrigation application efficiency of amend 80%, and	(b) demand conditions that occur in nine out of 10 years.
thedules thedule P: assifying and	oundwater and rface water sinectivity	chedule Q: !easonable and fficient use criteria				

chedule R:	When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Support with amendments	Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	
lepdown Ilocations	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river		However needs of stock drinking water and rootstock protection needs acknowledging	Add after health needs of people - stock drinking water and rootstock protection
	flows. Typically, the reduction in water take that may be required will be half the consented amount. Stepdown allocations for specific rivers are		However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish in consultation with water users.	Table R1 is interim GW to consult with water users
	a water user group. In other rivers, stepdown allocations may be agreed by a water user group,		As water is cleaned up the minimum flow requirement for dilution is lower.	
	or in the absence of agreement of such a group, may be implemented by the Wellington Regional Council.		The effects of low flows needs to demonstrated as are the effects of restrictions	
			There also needs to be room for the Whaitua to have their input	

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

River	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa Ríver	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

David Holmes

Submitter Number:

S419

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

Greater WELLINGTON
REGIONAL COUNCIL
TO PARE MATUR TRIBO

Preepost 3156 Wellington Regional Council PO Box 11646 Wellington 6142

GREGIZACKULISTAKA) RECICALI COMPÇE

Your details			· · · · · · · · · · · · · · · · · · ·			ŽI	-001 2015
Full name: Leo Vollebi	egt					\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	ROGIVED
Organisation name (if applicable):							4-101
Address for service: Leo							1
235	Pahautea Roa	id, RD1	1				
Fea	therston					,	
Telephone no's: Work: <u>063</u>	<u>088405</u> н	Home:	06308840	<u>5</u> c	Cell:	027258840	5
Contact person: Leo	/ollebregt						
Address and telephone no (if different f	rom above):	Bloods & Stanland & St					***************************************
Electronic communication					anguj 2 do mila,		MAKEN MAKEN PERSEADAN PERS
Wellington Regional Council has a pref We will send you updates on the proce here □ if you do not agree to receive c	ss, information and p	rovide you	n about the Pro I with details of	pposed Nati any meetin	ural Re ngs an	esources Plan via of the hearing. Plea	email. ase tick
Email address: Irvoll@xtra.	co.nz	**************************************	1744 m1 m21 24 24 24 24 24 24 24 24 24 24 24 24 24		+1	**************************************	***************************************
Trade competition				<u>-</u>			·
res I/we could not gain an advantage	e in trade competition	n through t	his submission	(If you ticked t	this box,	delete the rest of this s	section and
go straight to 'Your submission']	Leo Vollebregt 235 Pahautea Road, RD1, Featherston : 063088405						
I/we could gain an advantage in t	rade competition thro	ough this :	Submission				
If you could gain an advantage p	lease complete one	of the folio	wing:				
							the
Your submission							
The specific provision of the Proposed Natural Resources Plan that my submission							
relates to is (please specify the provision/	piovisionis.				ovision	n amended	
section number):		i					ails form
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	Atte	ndance	and wish to	be heard at h	nearing(s)					
1	уes				rt of my/our s eak in support		ssion at the hearing	g(s).]		
		[Note: 7	This means that	you cannot spe	apport of my/c eak at the heari invironment Co	ng. However,		your right to ap	opeal any decision made by the	he
		If other	s make a sim	ilar submissio	n, I will consid	der presenting	g a joint case with	n them at a hea	aring.	
	Sign	ature:		person making	or person authorision. N	•	ed if making an	Date:	20/10/2015	· · · · · ·

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

Leo Vollebregt

CLO-

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

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4

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

Relief sought	Ground water will be categorised A or B or C once GAV has field verified its connectivity with surface water and performed an empirical calibration of the model
Reasons	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground wanter takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category A groundwater need to be robust, and a mechanism or process must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B. at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Waihenga river level aconsent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers
Support/ Oppose/ Amend	amend
Text	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 8; and 10.2 in chapter 8; and Figures 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater and which is defined as being not directly connected to surface water from category C groundwater and which is defined as being not directly connected to surface water from category B groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,
Provision	Category A groundwat er Category B groundwat er (directly connected) Category B groundwat er (not directly connected) Category C groundwat er not er

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
legionally ignificant nfrastructure*	 the local authority wastewater and stormwater networks, systems and wastewater treatment plants 	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Jnused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	esoddO	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

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	improved objective.	red over time to meet that ve.			
able 3,6 roundwater irectly connected surface water	Nitrate concentrations do not caus effects on groundwater-dependent on aquatic plants, invertebrate or fin connected surface water bodies	Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
Objective O52	The efficiency of allo improved and maxim by means of:	The efficiency of allocation and use of water is improved and maximised through time, including by means of:	amend	Increasing water allocation allows for growth.	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of:
	(a) e.	efficient infrastructure, and		(a) to (e) are good means to the objective.	(a) to (e) are good means to the objective.
	g (a)	good management practice, including irrigation, domestic municipal and industry practices, and		There needs to be the possibility of storage in stream	Add (f) enabling storage within the bed of a river
	(O)	maximising reuse, recovery and recycling of water and contaminants, and			
	(d) e	enabling water to be transferred between users, and			
	e (e)	enabling water storage outside river beds.			
Policy P6: Synchronised expiry and review	Resource consents r common expiry or re sub-catchment, if:	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if:	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years	Retain Add (c) consents will run for a period of 25 years
lafes	(a) th	the affected resource is fully allocated or over-allocated, or		Due to the significant investment in infrastructure a long consent is necessary.	

		Add <u>diffuse contaminants to (b)</u>	retain	retain				
		(b) recognises the use of water for diluting wastewater and stormwater. Diffuse confaminants need to be included.	We are pleased to see irrigation get a special mention.					
		Amend	support	support				
	(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.	(b) treatment, dilution and disposal of wastewater and stormwater, and	(h) irrigation and stock water, and	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	(c) there are significant social and economic benefits for the region, and	(d) water remains available for multiple in-stream and out of stream uses concurrently, and	(e) the reliability of water supply improves as a result, and	(f) the damming and storage of water contributes to the
,		olicy P7: Uses of and and water (b) and (h)		Solicy P11: Instream water storage				

olicy P107: The framework for ramework for recognises: sking and using rater (a)				
(q)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and (b) the take and use of water does not exceed allocation amounts provided for in the Plan, and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence and evidence in the schedule P changes; -ve effect on consent holders — 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
(ý)	minimum flows or water levels are managed in accordance with the Plan provisions.			
Jolicy P109: Lapse Resource consents lates affecting commencement da justified due to the activity. For the pur effect to" includes the water meter or flow of the water in accoresource consent.	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	support	We support the use of water	
Solicy P111: Water The take and use o akes at minimum flows or water levels in the water levels in the	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

above minimum flows following a period of 10 days of continuous river levels at minimum flow	As above	Delete (c) (i)	
takes below minimum flows and lake levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep roofstock alive during prolonged low water levels	
	Amend	esoddo	
11), with the exception that water is available below minimum flows: (c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water vels	Policy P115: Authorising takes selow minimum lows and lake evels (d) and (c) i		

Retain	retain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the plan-being-made-operative renewal of consent to meet the criteria.
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing users replacing have a period of four years from the date of the plan being made
olicy P116: !eallocating water	Policy P117: Supplementary allocation amounts at flows above the nedian flow	Policy P118: Reasonable and Afficient use

	Retain	Refain	refain
	Support	Support	Support
operative to meet the criteria,	d to an existing resource cated to the same user urce consent is replaced, s changed, only if the nonstrate how the unused in four years, including by capital expenditure iramme linked to the lose water is used for, and siying the reasonable and ient use criteria identified in edule Q (efficient use).	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use of transferred water are the same or less, and
	olicy P119: nused water	Policy P120: Faking water for Itorage	Policy P128: Transfer of esource consents

					Make this rule <u>restricted discretionary</u>	
					The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	
					amend	amend
(b) the transfer occurs within the same catchment management unit, and	(c) the same or a lesser amount of water is being taken or used, and	(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and	(e) the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).		The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of
				<u> Zules</u>	Sule R135: Seneral rule for othe aking, use, the lamming and pen liscretionary activity	Rule R137: Farm boc fairy washdown Rul

affer "property." anti growth and I not in the best interests	during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136.	In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled	retain	
	<u> </u>	——————————————————————————————————————		amend th	support	
farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:	(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken	under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	
d milk-cooling ster – permitted stivity	^			Sule R143: - emporary water sermit transfers – controlled activity	Rule R144: Transferring water sermits – restricted liscretionary octivity	Other methods

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Vairarapa water aces	Wellington Keglo Wairarapa distric characterise the and the social, he Wairarapa water options for the w management opt to:	Wellington Regional Council Will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	בן פֿנו פֿ	the economic values of water laces are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	and economic values of the Wairarapa water races
Method M18: Water use groups	Wellington Regional Council will: (a) support wate voluntary agring water users, the manage alloc	support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	(q)	support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and			
	()	provide, where available, accurate technical information to assist user groups.			
Vethod M19: Water nanagement (d)	(p)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Method M28: Development of yood management oractice guidelines.	Wellington Regic develop practice rules) in collabor organisations an	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	refain

farmers es with the	neasured, Insert after - adverse effects - <u>that are measured</u> on aquatic	categories have been verified categories have been verified categories have been verified categories have been verified categories have been verified comment to categories have been verified categories.	Change the allocation amounts to what is currently allocated or more if spare water has been identified allocation arion of med the sustainable. It is an attion of the soccur from
positive move which will have farmers moving forward in their practices with the reg. council??	ind Important that the effects are measured, not just modelled.	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	
implementation of policies which rely on good management practice to achieve desired environmental outcomes.	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	Water allocation amounts Oppose	Surface and groundwater allocation amounts Oppose
	Yhaitua Vhaitua Volicy R.P3: Sumulative effects on river reaches of allocating water	Figures 7.3 – 7.8	<u>[ables 7.3 – 7.5</u>

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Needs empirical calibration by GW there there ts	Remove sentence the model must reliably-predict annual irrigation volume within an accuracy of 15% lable Add after field validated model – for Wairarapa conditions s is (a) add after 80% - where practicable.		
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed	
esoddo	Amend	amend	
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following criteria:	(a) an Irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.	
thedules thedule P: assifying and anaging oundwater and irface water nnectivity	chedule Q: !easonable and flicient use criteria		Y

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by	a water user group. In other rivers, stepdown allocations may be agreed by a water user group,	or in the absence of agreement of such a group, may be implemented by the Wellington Regional Council.	
chedule R:	lepdown llocations					

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

Ríver	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa Ríver	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga Ríver	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Richard Kershaw

Submitter Number:

S420

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON REGIONAL COUNCIL Te Pase Matur Talao

To:

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Freepost 3156 Wellington Regional Council PO Box 11646 Wellington 6142

GRANDENSKARANI FRANCIST PRIOR

Your details				The second second second second second second second second second second second second second second second se		2 1 0 0 7	- 2015
Full name:	Leo Vollet	oregt					
Organisation name (i Address for service:	Leo 23:	o Vollebregt 5 Pahautea F	pa Wate	r User's Inc. So	ociety		- - -
Telephone no's: Contact person: Address and telepho	Work: <u>06</u> Leo	Vollebregt	Home:	063088405	Cell:	0272588405	••
Electronic commun Wellington Regional We will send you upo here if you do not a	Council has a pro lates on the prod	ess, information a communication via	nd provide v	ion about the Propos ou with details of any	ed Natural F meetings a	Resources Plan via email. nd the hearing. Please tick	-
go straight to 'Your s □ I/we could gain If you could ga □I/we	submission] an advantage ir in an advantage are directly affe	trade competition please complete cated by an effect o	through this one of the fol	submission lowing: matter of my submis	sion that ad		
□l/we	are not directly	affected by an effe	ect of the sul	or the effects of trad oject matter of my su or the effects of trad	bmission tha	at adversely affects the	
Your submission The specific provisi Please continue on sepawww.ew.govt.nz/regio	arate sheet(s) – an						•
The specific provision of Natural Resources Plan relates to is (please spesection number):	that my submission	My submission on provision is ->	0 1	I support the provisi I oppose the provisi wish to have the spe	on ecific provisi		
		submission: . > I seek the followin decision from WRI (give precise detail	3	ui suomission	is allach	ed to this details for	

	Atte	ndance	and wish to	be heard at l	hearing(s)						
1	yes		wish to be h his means that				mission at the hea	ring(s).]			
		[Note: T	o not wish to This means that ton Regional C	you cannot sp	eak at the hea	ring. Howeve		win your rigl	it to appe	al any decision mad	e by the
		If others	s make a sim	lar submissic	n, I will cons	ider presenti	ing a joint case (with them at	a hearir	ng.	
	Sign	ature:					n ired if making an	Dal	e:	20/10/201	5

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

CLO

Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

€

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

, and	Text	Oppose/ Amend		
lafinitions				
Category A groundwat er	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model
Category B groundwat er (directly connected)	chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation.		amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted	
Category B groundwat	Groundwater not classified as either category A groundwater or category C		unnecessarily impacting on farm businesses severely.	
er (not directly connected)	directly connected to surface water through applying the tests in Schedule Q (efficient		The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided	
Category C	use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter	·	for identifying which Category aquifer a particular abstraction may be tapping.	
groundwat er	7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B		the 'effects', it would seem that Category A (i.e. direct connection) should be able to	
	groundwater (directly connected) is considered to be surface water allocation.		demonstrate a strong and consistent relationship between daily nver levels and	
	Groundwater not classified as either category A groundwater or category C		daily groundwater levels. It not then conditions linked to low flows will have no relevance. There should also be a clear	
	groundwater and which is defined as being not directly connected to surface water		and quantifiable difference between	
	through applying the tests in Schedule Q		'management approach' appears to be	
	(not directly connected) is at the locations		the same even mough the two adulters are demonstrably different in their	
	generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in		response to river levels.	
	chapter 10. Taking water from category B groundwater (not directly connected) is		In February 2015 work undertaken in the river bed by the Waihenga river level	
	considered to be groundwater allocation.		recorder interfered with readings so that	
	Groundwater not directly connected to		taking water even though the river had	
	shown in Figures 7.2-7.9 in chapter 7,		working by the river reported no adverse	

1-8.2 in chapter 8, and Figure Stroundwater is considered to water and part of the surface water and authority wastewater reatment plants There is no definition of what directly connected means. There is no definition of what directly connected means. There is no definition of what directly connected means. There is no definition of what directly connected means. There is no definition of what directly connected means. There is no definition of what directly connected means. There is no definition of what directly connected means. Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	than 25% of the maximum daily support ster allocated to a person for use on a own or have an interest in, but not er that is transferred for use at ion by means of a transfer permit, is it to not be used over a period of two lears.	conomic, cultural and environmental amend Objective does not give enough value to the use and using water are recognised for within the Plan's allocation	aquatic ecosystem health and in fresh water bodies and coastal where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal methans area is
8, and Figure water from is considered to Indifferent of at is directly and part of the nount. wastewater and ks, systems and lants	Where more than 25% of the maximum daily aup amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	ic, cultural and environmental nd using water are recognised thin the Plan's allocation	

able 3.6 roundwater	imp objective concentral effects on ground	improved over time to meet that objective. Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or promatic plants, invertebate or fish communities.	amend	Unrealistic and non defined The actual numerical amount needs to be	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
) surface water	in connected surf	in connected surface water bodies			
Objective O52	The efficiency of inproved and maby means of:	The efficiency of allocation and use of water is improved and maximised through time, including by means of:	amend	Increasing water allocation allows for growth.	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of:
	(a)	efficient infrastructure, and		(a) to (e) are good means to the objective.	(a) to (e) are good means to the objective.
	(a)	good management practice, including irrigation, domestic municipal and industry practices, and		I nere needs to be the possibility of storage in stream	Add (I) enabiling storage within the bed of a river
	©	maximising reuse, recovery and recycling of water and contaminants, and			
	(b)	enabling water to be transferred between users, and			
	(e)	enabling water storage outside river beds.			
olicy P6: Synchronised sxpiry and review	Resource consents common expiry or r sub-catchment, if:	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if:	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years	Retain Add (c) <u>consents will run for a period of 25 years</u>
lates	(a)	the affected resource is fully allocated or over-allocated, or		Due to the significant investment in infrastructure a long consent is necessary.	

	Add diffuse contaminants to (b)	retain	retain				
	(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	We are pleased to see inigation get a special mention.					
	Amend	support	support				
(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.	(b) treatment, dilution and disposal of wastewater and stormwater, and	(h) irrigation and stock water, and	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	(c) there are significant social and economic benefits for the region, and	(d) water remains available for multiple in-stream and out of stream uses concurrently, and	(e) the reliability of water supply improves as a result, and	(f) the damming and storage of water contributes to the
	Policy P7: Uses of and and water (b) and (h)		Policy P11: Instream water storage				

		efficient allocation and use of water.			
olicy P107: ramework for aking and using rater	The framework frecognises: (a) (b)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and (b) the take and use of water does	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence linsert (d) when schedule P changes; -ve effect on consent holders - 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
	(i) (ii)	not exceed allocation amounts provided for in the Plan, and minimum flows or water levels are managed in accordance with the Plan provisions.		An empirical calibration is necessary.	
Solicy P109: Lapse lates affecting vater takes	Resource consent given effect to with commencement of justified due to the activity. For the prefect to includes water meter or floof the water in accresource consent.	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	support	We support the use of water	
Policy P111: Water akes at minimum	The take and us flows or water le water levels in t	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

above minimum flows following a period of 10 days of continuous river levels at minimum flow		<u>As above</u>	Delete (c) (i)	
takes below minimum flows and lake levels)(d) on restrictions	should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
		Amend	esoddo	
11), with the exception that water is available below minimum flows:	(c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water vels	☆	olicy P115: Authorising takes selow minimum lows and lake evels id) and (c) i		

Retain	retain	(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan-being-made-operative renewal of consent to meet the criteria"
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
olicy P116: :eallocating water	Policy P117: Supplementary allocation amounts at flows above the nedian flow	Policy P118: Reasonable and Efficient use

	Retain		Retain	retain
	Support		Support	Support
operative to meet the criteria, and	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of: (a) a capital expenditure programme linked to the	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use of transferred water are the same or less, and
	olicy P119: nused water		olicy P120; aking water for storage	olicy P128; Transfer of esource consents

	(g)	the transfer occurs within the same catchment management unit, and			
	(o)	the same or a lesser amount of water is being taken or used, and			
	(p)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(e)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
Zules					
Rule R135: Seneral rule for aking, use, lamming and liverting water – liscretionary	The damming or otherwise contra the Resource Mipermitted, contra discretionary, no activity is a discr	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule restricted discretionary
Rule R137: Farm	The take and us body (other than Rule R138) or gr	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

(a)	during-the-three-years-prior-to-the-date-of- public-notification of the Proposed-Natural Resources-Plan (31.07.2015), and	Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136.	council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	Delete Centrolled and make this rule a <u>permitted</u> activity	retain	
(b) delete words after "property." Leaving this in is anti growth and development and not in the best interests	or the wairarapa			Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled		
				amend	support	
fam dairy washdown and milk cooling on a dairy milking platforn is a permitted activity, provided the following conditions are met:	(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.	In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	
id milk-cooling ater – permitted tivity				Sule R143: emporary water sermit transfers – controlled activity	Sule R144: Transferring water sermits – restricted liscretionary rctivity	Other methods

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Vairarapa water aces	Wellington Region Wairarapa district characterise the hand the social, he Wairarapa water roptlons for the wamanagement optitio:	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
Vethod M18: Water use groups	Wellington Regional Council will: (a) support water water users, 1 manage alloc support water (b) support water users with water users, 1 manage alloc support water users, 1 manage alloc manage alloc assist with water users with water	support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	9	provide, where available, accurate technical information to assist user groups.			
Method M19: Water nanagement (d)	(p)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Method M28: Jevelopment of Jood management practice guidelines.	Wellington Regio develop practices rules) in collabora organisations and	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
tuamahanga Whaitua Volicy R.P3: Sumulative effects on river reaches of allocating water	When allocaling river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects - <u>that are measured</u> on aquatic
Figures 7.3 – 7.8	Water allocation amounts	Oppose	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change similaranthy.	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u>[ables 7.3 – 7.5</u>	Surface and groundwater allocation amounts	Oppose	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identified

Needs empirical calibration by GW		(a) add after of 70 - Wiede practicality.
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed
əsoddo	Amend	amend
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following criteria:	(a) an irrigation application efficiency of 80%, and(b) demand conditions that occur in nine out of 10 years.
ihedules shedule P: assifying and anaging oundwater and irface water nnectivity	chedule Q: !easonable and fficient use criteria	

	Add after health needs of people - <u>stock drinking</u> <u>water and rootstock protection</u>	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. I ypically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by	a water user group. In other rivers, stepdown allocations may be agreed by a water user group, or in the absence of agreement or such a group.	may be implemented by the Wellington Regional Council.	
chedule R: suideline for	repuown Ilocations					

Table R1: Stepdown allocations for rivers in the Ruamähanga River catchment

Ríver	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200	-	[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Ray Craig

Submitter Number:

S421

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON REGIONAL COUNCIL Te Pane Matus Taise

То:

Freepost 3156 Wellington Regional Council PO Box 11646

Wellington 6142

Section of the Section 1

Telephone no's: Work: 0	Wairarapa eo Vollebregt 35 Pahautea Roa eatherston	Water (ciety	4
Address for service: 23 F6 Telephone no's: Work: 0 Contact person: Let	Wairarapa eo Vollebregt 35 Pahautea Roa eatherston	Water (User's Inc. Soc	ciety	4
23 Fe Telephone no's: Work: 0 Contact person: Lea	eo Vollebregt 35 Pahautea Roa eatherston				
Telephone no's: Work: 0 Contact person: Lea	eatherston	d, RD1	3	******************	a manufacture of the appropriate gar annual rays, as a may not have been a viscously from the party and
Telephone no's: Work: 0 Contact person: Lea	eatherston				
Contact person: Let	63088405 H				
**************************************		lome: _	063088405	Cell:	0272588405
Address and telephone no (if differe	o Vollebregt				
and the property in amore	ent from above):			AND A MEETIN JAMES IN SQUARE A PROPERTY OF STREET	
Electronic communication		* Other when the second date is the charles we conduct account			PROMPTICE CONTINUES CONTIN
Wellington Regional Council has a p We will send you updates on the pro here □ if you do not agree to receiv Email address: IrVoII@Xtu	ocess, information and p re communication via em	rovide you ail.	with details of any n	neetings ar	nd the hearing. Please tick

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☐ I/we could gain an advantage	in trade competition thro	ough this s	ubmission		
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	ected by an effect of the as not relate to trade con				
	ly affected by an effect c as not refate to trade con				
Your submission					
The specific provisions of the Proplems continue on separate sheet(s) - a www.gw.govt.nz/regional-plan-review	m excel spreadsheet of all o				
The specific provision of the Proposed Natural Resources Plan that my submission	My submission on this provision is ->		support the provision		1900,000 00 00 00 00 00 00 00 00 00 00 00
Matural Mesources Flatt that thy Stormssi			oppose the provision rish to have the spec		n amended
relates to is (please specify the provision/	1	5			
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relates to is (please specify the provision/ section number):		oui	r submission is	attache	ed to this details fo

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		[Note: T	not wish to this means that ton Regional C	you cannot sp	eak at the he	earing. Howe		ill rewin you	r right to a	ppeal a	ny decision made b	y the
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Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

Ę

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

		Oppose/ Amend		
Category A wat er Greer groundwat er (directly connected) approundwat er (not directly connected) approundwat er (not directly connected) approundwat er (not directly approundwat er (connected) approundwat er (connected) approundwat er (connected) approundwat er (connected) approundwat er (connected) approundwat er (connected) approundwat er (connected) approundwat er (connected) appround approun	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7.5 Figures 8.1 and 8.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category C groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water from category B groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally services water at the locations generally shown in Figures 7.2-7.9 in chapter 7, shown in Figures 7.2-7.9 in chapter 7,	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category A, B and C groundwater need to be robust, and a mechanism or process must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and quantifiable difference between conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B.at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work underfaken in the river bed by the Waihenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model
Yks	own in Figures 7.2-7.9 in chapter 7,		working by the river reported no adverse	

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
legionally ignificant nfrastructure*	 the local authority wastewater and stormwater networks, systems and wastewater treatment plants 	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Jnused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	Oppose	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

		efficient allocation and use of water.			
olicy P107: ramework for aking and using /ater	The framework frecognises: (a) (b)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and (b) the take and use of water does not exceed allocation amounts provided for in the Plan, and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence in the schedule P changes; -ve effect on consent holders - 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
Policy P109: Lapse	Resource conse	levels are managed in accordance with the Plan provisions. Resource consents to take and use water shall be	support	We support the use of water	
lates affecting vater takes	given effect to wir commencement c justified due to the activity. For the preffect to" includes water meter or flo of the water in accresource consent	given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.			
Policy P111: Water akes at minimum	The take and us flows or water le water levels in	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	reduce take by 50% of the amount consented

Refain	retain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the-plan-being-made-operative renewal of consent to meet the criteria".
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	ателд
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
olicy P116: !eallocating water	Supplementary supplementary allocation amounts at flows above the nedian flow	Solicy P118: Reasonable and Afficient use

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refain		Support	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use of transferred water are the same or less, and	Policy P128: Transfer of esource consents
Retain	+-	Support	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	olicy P120: Faking water for itorage
			(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).	
			(a) a capital expenditure programme linked to the purpose water is used for, and	
Retain		Support	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of:	olicy P119: nused water
			operative to meet the criteria, and	
1	Retain		Support Support Support Support	rice Support sed, sed, by ture the and and and and ain ole Support Support sed Support sed support sed seke

	(q)	the transfer occurs within the same catchment management unit, and	i		
	0	the same or a lesser amount of water is being taken or used, and			
	(b)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
	(e)	the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
<u>Rules</u>					
Rule R135: 3eneral rule for aking, use, lamming and liverting water – liscretionary	The damming or otherwise contrathe Resource Mermitted, contradiscretionary, in activity is a disc	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
R137; Farm	The take and us body (other tha Rule R138) or g	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

	Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	it Delete Controlled and make this rule a <u>permitted</u> the activity ic way to be a	retain	
(b) delete words after "property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa		Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled	oort	
farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met: (b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136. In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	
id milk-cooling ater – permitted ativity }		Tule R143: Cemporary water Dermit transfers— controlled activity	Sule R144: Transferring water sermits – restricted liscretionary ctivity	Other methods

lethod M13: Vairarapa water sces	Wellington Regio Wairarapa distric characterise the and the social, he Wairarapa water options for the w management opt	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
Vethod M18: Water ise groups	Wellington Regional Council will: (a) support water users, the manage alloo support water	support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and provide, where available, accurate technical information	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
Wethod M19: Water nanagement (d)	(p)	to assist user groups. promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to quantify costs and benefits of water races and explore alternatives
Vethod M28: Development of yood management yractice guidelines.	Wellington Reglodevelop practice rules) in collabor organisations an	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

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	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
tuamahanga Whaitua Policy R.P3: Sumulative effects on river reaches of	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects – <u>that are measured</u> on aquatic
Figures 7.3 – 7.8	Water allocation amounts	esoddO	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u> Fables 7.3 – 7.5</u>	Surface and groundwater allocation amounts	Oppose	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identified

d d sre	Remove sentence the model must reliably predict annual irrigation volume within an accuracy of 15% ole Add after field validated model – for Wairarapa tonditions.	(a) add affer 80% - where practicable.	
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed	
esoddo	Amend	amend	
	A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following	criteria: (a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.	
thedules thedule P: assifying and anaging oundwater and irface water	chedule Q: :easonable and fficient use criteria		

	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waiheng are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments			1			***************************************
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 infless otherwise agreed by	a water user group. In other rivers, stepdown allocations may be agreed by a water user group,	of iff the absence of agreement of such a group, may be implemented by the Wellington Regional Council.	
chedule R: iuideline for	lecations					

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

River	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamähanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Shaun Rose

Submitter Number:

S422

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

Greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matus Talso

To:

Freepost 3156 Wellington Regional Council PO Box 11646 Wellington 6142

GREEL LANGUAGE, GO. Recommend by Fort

Your details			Ž T ÚČT 20
Full name: Leo \	/ollebregt		
Organisation name (if applicab		Water User's Inc. Society	4.1(
Address for service:	Leo Vollebregt		
APP Shirton and armonic	235 Pahautea Road	J, RD1,	MARIN APARTUS VICENSI ARABATAN ANI ANI ANI ANI ANI ANI
	Featherston		7
Telephone no's: Work:	063088405 на	ome: <u>063088405</u> Cell: <u>027</u>	2588405
Contact person:	Leo Vollebregt		
Address and telephone no (if o	lifferent from above):		
БОТИ ПОСТИТЕ ИТИ БИТИ ТОТО ИСТИМИ МИТИМИ ВТИДУ ФЕДЕРОТИК СЕТИТИВНИ МЕТИТОРИИ.		THE PROPERTY OF THE PROPERTY O	
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here 🛘 if you do not agree to r	eceive communication via ema	il.	carrig. Crease IICA
Email address: rvoll(@xtra.co.nz	77. MINE (M. 1807)	
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	ntage in trade competition thros		
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		the subject matter of my submission that advers	sely affects the
environment, an	d does not relate to trade comp	petition or the effects of trade competition.	
Your submission	1998-1-1 (1988-1-1988)		^
The specific provisions of th	e Proposed Natural Resourc	es Plan that this submission relates to are:	
	(s) – an excel spreadsheet of all of	the proposed plan provisions is available online	
The specific provision of the Propos Natural Resources Plan that my sul	omission provision is ->	☐ I support the provision ☐ I oppose the provision	
relates to is (please specify the pro- section number):	vision/	☐ I wish to have the specific provision amen	ided
***************************************	Reasons for my submission:: →	our submission is attached to t	this details form
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	I seek the following		
	decision from WRC		1

	Atte	ndance	and wish to be heard at hearing(s)			
1	yes		o wish to be heard in support of my/our submission This means that you wish to speak in support of your submission at the hearing(s).]			
		[Note: 7	o not wish to be heard in support of my/our submission This means that you cannot speak at the hearing. However, you will still retain your gon Regional Council to the Environment Court.]	right to ap	appeal any decision made by the	<u> </u>
		If other	s make a similar submission, I will consider presenting a joint case with ther	m at a he	earing.	
	Sign	ature:	[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]	Date:	20/10/2015	** ********

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

p.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

Leo Vollebregt

CL(0) =

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

Ę

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

Relief sought		Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model
Reasons		The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category A, B and C groundwater need to be robust, and a mechanism or process must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B.at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Waihenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers
Support/ Oppose/ Amend		amend
Text		Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 10. Taking water 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater fron category B groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,
Provision	Pfinitions	Category A groundwat er Category B groundwat er (directly connected) Category B groundwat er (not directly connected) Category C groundwat er er (not directly connected) Category C groundwat er er

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
legionally ignificant nfrastructure*	the local authority wastewater and stormwater networks, systems and wastewater treatment plants	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plantswater race networks and facilities for the irrigation of pasture and crops
Jnused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	esoddo	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

able 3.6 roundwater irectly connected	improved over time objective. Nitrate concentrations do not caus effects on groundwater-dependent on aquatic plants, invertebrate or fin connected surface water bodies	improved over time to meet that objective. Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
Objective O52	The efficiency of al improved and maxiby means of: (a) (b) (d) (e)	The efficiency of allocation and use of water is improved and maximised through time, including by means of: (a) efficient infrastructure, and including irrigation, domestic municipal and industry practices, and one industry and recycling of water and contaminants, and contaminants, and transferred between users,	amend	Increasing water allocation allows for growth. (a) to (e) are good means to the objective. There needs to be the possibility of storage in stream	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) enabling storage within the bed of a river
Policy P6: Synchronised sxpiry and review lates	Resource consents common expiry or sub-catchment, if.	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if: (a) the affected resource is fully allocated or over-allocated, or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) <u>consents will run for a period of 25 years</u>

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	(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.			
olicy P7: Uses of and and water (b) and (h)	(b) treatment, dilution and disposal of wastewater and stormwater, and	Amend	(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	Add diffuse contaminants to (b)
	(h) irrigation and stock water, and	support	We are pleased to see irrigation get a special mention.	retain
Solicy P11: Instream water	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	support		retain
	(c) there are significant social and economic benefits for the region, and			
	(d) water remains available for multiple in-stream and out of stream uses concurrently, and			
	(e) the reliability of water supply improves as a result, and			
	(f) the damming and storage of water contributes to the			

	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence evidence consent (d) when schedule P changes; -ve effect on consent holders - 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."			Category A groundwater which shall be required to reduce take by 50% of the amount consented
	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.		We support the use of water	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising
	amend		support	Amend
efficient allocation and use of water.	groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and the take and use of water does not exceed allocation amounts provided for in the Plan, and	(c) minimum flows or water levels are managed in accordance with the Plan provisions.	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-
				-
	olicy P107: ramework for sking and using rater		Policy P109: Lapse Jates affecting vater takes	olicy P111: Water akes at minimum

above minimum flows following a period of 10 days of continuous river levels at minimum flow	<u>As above</u>	Delete (c) (i)	
takes below minimum flows and lake levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep roofstock alive during prolonged low water levels	
	Amend	esoddo	
11), with the exception that water is available below minimum flows: (c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water backs by:	Policy P115: Authorising takes below minimum lows and lake evels	5.	

Retain	retain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made operative renewal of consent to meet the criteria"
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
olicy P116: :eallocating water	olicy P117: Supplementary allocation amounts at flows above the nedian flow	Policy P118: Reasonable and sflicient use

	The state of the s		
	operative to meet the criteria, and		
olicy P119: nused water	Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of:	Support	Retain
	(a) a capital expenditure programme linked to the purpose water is used for, and		
	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).		
Policy P120; Faking water for storage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	Retain
olicy P128: Transfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided:	Support	retain
	(a) the adverse effects of the take and use of transferred water are the same or less, and		

		the transfer occurs within the same catchment management unit, and			
	(0)	the same or a lesser amount of water is being taken or used, and			
	(9)	measuring and reporting the use of transferred water is no less than in the parent resource consent, and			
		the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).			
र्याहर					
Rule R135: Seneral rule for aking, use, samming and liverting water fiscretionary activity	The damming or otherwise confront the Resource Mermitted, controdiscretionary, no activity is a discretionary.	The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	amend	The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal	Make this rule <u>restricted discretionary</u>
Rule R137: Farm Jairy washdown	The take and us body (other than Rule R138) or g	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	amend		

(b) the total take shall be no more than 70L pe day per stock unit based on the maximum herd size on the property at any time	during the three-years-prior to the date-of public-notification of the Proposed Natural Resources-Plan-(31.07.2015), and	Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136.	In respect of condition (b) the Wellington Regional	on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	Delete Controlled and make this rule a <u>permitted</u> activity	retain	
(b) delete words after "property." Leaving this in is anti growth and development and not in the best interests	or the Warrarapa				Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled		
					amend	support	
farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:	(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	Note Water taken for farm dairy washdown and cooling	under Rule R136.	In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	
id milk-cooling ster – permitted stivity					R143; Temporary water sermit transfers—controlled activity	Sule R144: Transferring water sermits – restricted liscretionary ctivity	<u> </u>

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Vairarapa water aces	Wellington Regic Wairarapa distric characterise the and the social, h Wairarapa water options for the w management opf to:	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
vethod M18: Water use groups	Wellington Regional Council will: (a) support water users, the manage allocation support water water water water water water water water assist with water and and and accurate techniques.	support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and provide, where available, accurate technical information to assist user groups.	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
Method M19: Water nanagement (d)	(b)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to <u>quantify costs and</u> benefits of water races and explore alternatives
Method M28: Development of good management practice guidelines.	Wellington Regir develop practice rules) in collabor organisations an	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
<u>tuamahanga</u> <u>Whaitua</u> Policy R.P3: Sumulative effects on river reaches of	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects – <u>that are measured</u> on aquatic
Figures 7.3 – 7.8	Water allocation amounts	Oppose	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u>Fables 7.3 – 7.5</u>	Surface and groundwater allocation amounts	esoddo	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identified

Needs empirical calibration by GW		(a) add after 60% - Where practicable.
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed
osoddo	Amend	amend
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following criteria:	(a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.
thedules thedule P: assifying and anaging oundwater and irface water nnectivity	chedule Q: !easonable and fficient use criteria	

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use	r Add after health needs of people - <u>stock drinking</u> water and rootstock protection	Table R1 is interim of GW to consult with water users		wo		
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise arreed by	a water user group. allocations may be agreed by a water user group,	of it the absence of agreement of such a group, may be implemented by the Wellington Regional Council.	
chedule R:	lecations		<u> </u>			

Table R1: Stepdown allocations for rivers in the Ruamähanga River catchment

Ríver	Winimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamähanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Willem Stolte

Submitter Number:

S423



Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

9 greater WELLINGTON REGIONAL COUNCIL To Pano Matus Taizo

To:

Freepost 3156 Wellington Regional Council PO Box 11646 Wellington 6142

6830 Carretto de los Especies de la Parente

Your details			21	ÚCT 20
Full name: Leo Voll	ebregt		i i i	Oğiyêd
2	Wairarapa \ eo Vollebregt 35 Pahautea Roac eatherston	Vater User's Inc. Soci	ety	4.10
Telephone no's: Work:	63088405 на o Vollebregt	ome: <u>063088405</u>	Cell: 0272588405	
Electronic communication Wellington Regional Council has a We will send you updates on the pr here □ if you do not agree to receive Email address: IVOI @X	ocess, information and pro re communication via ema	vide you with details of any m	Natural Resources Plan via e eelings and the hearing. Pleas	mail. se tick
Trade competition (CS) I/we could not gain an advan go straight to "Your submission" I/we could gain an advantage		hrough this submission <i>(if you ti</i>	cked this box, delete the rest of this se	ction and
environment, and do	fected by an effect of the ses not relate to trade comp	subject matter of my submission petition or the effects of trade of	ompelition.	
		the subject matter of my submoetition or the effects of trade c		he
Your submission The specific provisions of the Pr Please continue on separate sheet(s) - www.gw.govt.nz/regional-plan-review	in excel spreadsheet of all of			MARKET PERSONAL PROPERTY AND ADMINISTRATION OF THE PERSONAL PROPER
The specific provision of the Proposed Natural Resources Plan that my submiss relates to is (please specify the provision section number):		☐ I support the provision☐ I oppose the provision☐ I wish to have the specif		
	Reasons for my submission:: ->	our submission is	attached to this detai	ls form
	decision from WRC (give precise details): →			

	Atte	ndance	and wish to	pe heard at l	nearing(s)					
(<u>zes</u>		o wish to be h This means that				nission at the hearing	g(s).]		
		[Note: I	o not wish to l This means that ton Regional C	you cannot sp	eak at the hea	iring. However		your right to a	ppeal any decision made by t	he
		if other	s make a simi	lar submissic	n, I will con	sider presenti	ng a joint case with	n them at a he	earing.	
	Sign	ature:	L .	erson making	•	therised to sign NB. Not requi	a red if making an	Date:	20/10/2015	

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

CLO-

Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

€

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

Relief sought	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model	
Reasons	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category aquifer a particular abstraction may be tapping. Since any conditions must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily more levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B. at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Waihenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers	
Support/ Oppose/ Amend	amend	
Text	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater not classified as either category A groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water from category B groundwater and which is defined as being not directly connected is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally sendered to be groundwater allocation. Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7, in c	
Provision	Category A groundwat er Category B groundwat er (directly connected) Category B groundwat er (not directly connected) Category C groundwat er er (not er er er er er er er er er er er er er	

,				
	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
legionally ignificant nfrastructure*	 the local authority wastewater and stormwater networks, systems and wastewater treatment plants 	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Jnused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	osoddO	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Remove

nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3		the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective.	Add (f) enabling storage within the bed of a river				Retain Add (c) <u>consents will run for a period of 25 years</u>		
Unrealistic and non defined The actual numerical amount needs to be	stated	Increasing water allocation allows for growth. (a) to (e) are good means to the objective.	There needs to be the possibility of storage in stream				We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years	Due to the significant investment in infrastructure a long consent is necessary.	
amend		amend					Support/ amend		
ļ	on aquatic plants, invertebrate or fish communities in connected surface water bodies	The efficiency of allocation and use of water is improved and maximised through time, including by means of: (a) efficient infrastructure, and	(b) good management practice, including irrigation, domestic municipal and industry practices, and	(c) maximising reuse, recovery and recycling of water and contaminants, and	(d) enabling water to be transferred between users, and	(e) enabling water storage outside river beds.	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if:	(a) the affected resource is fully allocated or over-allocated, or	
able 3.6 roundwater	irectly connected) surface water	Objective O52					Policy P6: Synchronised expiry and review	lates	

			(f) the damming and storage of water contributes to the	
			(e) the reliability of water supply improves as a result, and	
			(d) water remains available for multiple in-stream and out of stream uses concurrently, and	
			(c) there are significant social and economic benefits for the region, and	
retain		support	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	Policy P11: In- stream water storage
retain	We are pleased to see irrigation get a special mention.	support	(h) irrigation and stock water, and	
Add <u>diffuse contaminants to (</u> b)	(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	Amend	(b) treatment, dilution and disposal of wastewater and stormwater, and	Policy P7: Uses of and and water (b) and (h)
•			(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.	
				,

		efficient allocation and use of water.			
olicy P107: ramework for aking and using rater	The framework recognises: (a)	The framework for the take and use of water recognises: (a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm	(a) the groundwater connectivity described in schedule P needs verifying and GW have a significant part to play in establishing the evidence insert (d) when schedule P changes; -ve effect on consent holders – 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
	(a) (b)	the take and use of water does not exceed allocation amounts provided for in the Plan, and minimum flows or water		businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	
		levels are managed in accordance with the Plan provisions.			
olicy P109: Lapse tates affecting vater takes	Resource consengiven effect to wit commencement commencement justified due to the activity. For the peffect to "includes water meter or flo of the water in acresource consent	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	support	We support the use of water	
olicy P111: Water akes at minimum	The take and us flows or water le water levels in	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111(water takes at minimum flows and water levels)(c) and 115(authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

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above minimum flows following a period of 10 days of continuous river levels at minimum flow	<u>As above</u>	Delete (c) (i)	
takes below minimum flows and lake levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
	Amend	esoddo	
11), with the exception that water is available below minimum flows: (c) as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water vels	Policy P115: Authorising takes selow minimum lows and lake evels d) and (c) i		

Retain	retain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the plan-being-made-eperative renewal of consent to meet the criteria.
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made
olicy P116: eallocating water	Solicy P117: Supplementary allocation amounts at flows above the nedian flow	Policy P118: Reasonable and Afficient use

	operative to meet the criteria,		
	and		
olicy P119: nused water	rer allo y be re isting ction r ction r er can	Support	Retain
	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).		
olicy P120: Caking water for storage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	Retain
Policy P128: Transfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided: (a) the adverse effects of the take and use of transferred water are the same or less, and	Support	refain

					Make this rule <u>restricted discretionary</u>		
					n infrastructure by users making this rule onary gives consent tainty at the time of		
within the catchment and	nount of or used,	ing the er is no esource	ake and efficient noluding ole and utified in se).		amend	water nitted by amend	
(b) the transfer occurs within the same catchment management unit, and	(c) the same or a lesser amount of water is being taken or used, and	(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and	(e) the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).		The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the mithose of	
				<u>Rules</u>	Sule R135: Seneral rule for other aking, use, the F samming and liverting water – discrizionary activity	The Yule R137: Farm body	

			Other methods
	support	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	Kule R144: Transferring water Dermits – restricted Itscretionary Ictivity
Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled	amend	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	Rule R143; emporary water sermit transfers— controlled activity
		In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.	
		Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.	
		(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and	~
(b) delete words after "property." Leaving this in is anti growth and development and not in the best interests of the Wairsrana		farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:	id milk-cooling ater – permitted itivity
	(b) delete words after " property." Leaving this in is anti growth and development and not in the best in of the Wairarapa Rule 143 (temporary water permit transfers) – for this rule to serve th objective in a usable and dynamic transferring water permits needs to permitted activity not controlled		support

validaba walei 308s	Wellington Regio Wairarapa distric characterise the and the social, he Wairarapa water options for the wmanagement opt to:	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
Method M18: Water Ise groups	Wellington Regional Council will: (a) support water year water users, the manage alloc support water water water water was sasist with was was sasist with water was sasist with was sasist with water was sasist with was said which was said which was said was sa	support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and support water user groups to assist with water sharing during	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	(2)	and provide, where available, accurate technical information to assist user groups.			
Vethod M19: Water nanagement (d)	(p)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to quantify costs and benefits of water races and explore alternatives
Method M28: Development of good management practice guidelines,	Wellington Regic develop practice rules) in collabor organisations an	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
<u>Vhaitua</u> Vhaitua Volicy R.P3: Sumulative effects on river reaches of allocating water	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects – <u>that are measured</u> on aquatic
Figures 7.3 – 7.8	Water allocation amounts	esoddo	Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u> [ables 7.3 – 7.5</u>	Surface and groundwater allocation amounts	obbose	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identified

Needs empirical calibration by GW	Remove sentence the model must reliably predict annual irrigation volume within an accuracy of 15% Add after field validated model – for Wairarapa conditions (a) add after 80% - where practicable.	
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required. irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed	
oppose	Amend	
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following criteria: (a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.	
thedules shedule P: assifying and anaging oundwater and irface water annectivity	chedule Q: !easonable and fficient use criteria	

 4	- <u>stock drinking</u>					
	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by	a water user group. In other rivers, stepdown allocations may be agreed by a water user group,	may be implemented by the Wellington Regional Council.	
chedule R: Juideline for	tepdown llocations					

Table R1: Stepdown allocations for rivers in the Ruamähanga River catchment

Ríver	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Wanagement point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardelis
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Gary Svenson

Submitter Number:

S424



Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON REGIONAL COUNCIL To Pane Matus Talao

To:

Freepost 3156 Wellington Regional Council PO Box 11646

Wellington 6142

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Wairarapa \		ociety	
35 Pahautea Roac	1 004		
eatherston			
<u> 63088405</u> н	ome: <u>063088405</u>	Cell: <u>027258840</u>	5
Vollebregt			
nt from above):			
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FILE COMPANIES IN THE PROPERTY OF THE PROPERTY			**************************************
reference for providing in	formation about the Propos	ed Natural Resources Plan via	email.
cess, information and pre communication via ema	ovide you with details of any sil.	meelings and the hearing. Ple	ase tick
a.co.nz			
age in trade competition	through this submission (If yo	u ticked this box, delete the rest of this	section and
,	,		
in trade competition thro	ugh this submission		
e please complete one of	the following:		
ected by an effect of the s	subject matter of my submis	sion that adversely affects the	
			the
s not relate to trade comp	petition or the effects of trad-	e competition.	
an and Matural December		tt	
My submission on this			
Al piovisions			
Reasons for my	our submission	is attached to this det	ails for
submission: : ->	TIDICONTINUES IDE	io altaoned to this det	uno IUI
I seek the following			
decision from WRC			
	eo Vollebregt 35 Pahautea Road eatherston 63088405 He o Vollebregt Int from above): Description of the second relate to trade complete one of the seco	eo Vollebregt 35 Pahautea Road, RD1, eatherston 63088405	as Pahautea Road, RD1, astherston 63088405 Home: 063088405 Celt: 027258840 by Vollebregt Interpretence for providing information about the Proposed Natural Resources Plan via coess, information and provide you with details of any meetings and the hearing. Ple ecommunication via email. Fa.CO.NZ age in trade competition through this submission ## you ticked this box, detate the rest of this in trade competition through this submission the please complete one of the following: ected by an effect of the subject matter of my submission that adversely affects is not relate to trade competition or the effects of trade competition. By affected by an effect of the subject matter of my submission that adversely affects is not relate to trade competition or the effects of trade competition. By affected by an effect of the subject matter of my submission that adversely affects is not relate to trade competition or the effects of trade competition. By affected by an effect of all of the proposed plan provisions is available entire. By submission on this I support the provision

	Attendance and wish to be heard at hearing(s)								
(▼ES I/We do wish to be heard in support of my/our submission [Note: This means that you wish to speak in support of your submission at the hearing(s).]								
		[Note: T	lo not wish to be heard in support of my/our submission This means that you cannot speak at the hearing. However, you will still retain your gron Regional Council to the Environment Court.]	right to a	appeal any decision made by the				
	☐ If others make a similar submission, I will consider presenting a joint case with them at a hearing.								
	Sign	ature:	[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]	Date:	20/10/2015	+ 10 00m=44			

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,

Wellington Regional Council

c/- Leo Vollebregt,

Wellington

235 Pahautea Road,

RD1,

Featherston.

21st October 2015

Dear Sir/Madam

Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely

CLO

Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster

Sandra Shivas

Shane Gray

₹

George Ritchie

Stephen Hammond

Gerard Vollebregt

Bryan Tucker

Rod Sutherland

Bob Tosswill

Richard Kershaw

Shaun Rose

Willem Stolte

Richard Osborne

Blair Roberts

Hayden Thurston

Brian Bosch

Stewart Weatherstone

Owen Butcher

Donald McCreary

Leo and Rebecca Vollebregt

Kurt Simmonds

Chris Engel

Andrew Harvey

John Barton

Mike Warren

Mike Moran

Simon Campbell

Matt Honeysett

David Holmes

Mike Slater

Ray Craig

Mark Guscott

Ed Handyside

Brad Gooding

Daniel George

Neville Davies

Gary Svenson

Ann Gray

Sandy Bidwill

Lewis Herrick

John Petrie

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

Category A groundwater of teach connected to surface a mend a feet of groundwater from Category B countwater of teach connected to surface a feet from Category B countwater of teach connected to surface a feet from Category B countwater for Category	Provision	Text	Support/ Oppose/ Amend	Reasons	<u>Relief sought</u>
Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in a depending shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in a depending shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in a depending water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 10. Groundwater is considered to be surface water allocation of an expensive and annongs; the users the state of the control	efinitions				
	Category A groundwat er (directly connected) Category B groundwat er (directly connected) Category C groundwat er (affectly connected) Category C groundwat er er er er er er er er er er er er er	Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation. Groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation. Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water floor directly connected is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater not directly connected) is soundwater not directly connected by surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,	amend	The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely. The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category A, B and C groundwater need to be robust, and a mechanism or process must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B. at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels. In February 2015 work undertaken in the river bed by the Waihenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers	Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
iroundwater irectly onnected to urface water	Category A groundwater and the component of category B groundwater that is directly connected to surface water and part of the surface water allocation amount.	amend	There is no definition of what directly connected means.	Ground water in the bore is at the same level as the water in the river and moves up and down with the level of the river
tegionally ignificant nfrastructure*	 the local authority wastewater and stormwater networks, systems and wastewater treatment plants 	amend	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants water race networks and facilities for the irrigation of pasture and crops
Jnused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support		retain
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	the social, agricultural, industrial, cultural and environmental benefits of taking and using water fo current uses and also for future needs are recognised and provided for within the Plan's allocation framework"
Objective O25 (c)	To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area: (c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is	esoddo	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known	Кеточе

able 3.6 roundwater irectly connected 3 surface water	im obtained in the concentrate of son groun on aquatic plant in connected su	improved over time to meet that objective. Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies	amend	Unrealistic and non defined The actual numerical amount needs to be stated	nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3
Objective O52	The efficiency of improved and m by means of: (a) (b) (c) (d)	The efficiency of allocation and use of water is improved and maximised through time, including by means of: (a) efficient infrastructure, and including irrigation, domestic municipal and industry practices, and industry practices, and contaminants, and contaminants, and contaminants, and transferred between users, and transferred between users, and transferred between users, and irver beds.	amend	Increasing water allocation allows for growth. (a) to (e) are good means to the objective. There needs to be the possibility of storage in stream	the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) enabling storage within the bed of a river
Policy P6: Synchronised sxpiry and review tates	Resource consents common expiry or r sub-catchment, if:	Resource consents may be granted with a common expiry or review date within a whaitua or sub-catchment, if: (a) the affected resource is fully allocated or over-allocated, or	Support/ amend	We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.	Retain Add (c) <u>consents will run for a period of 25 years</u>

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	3	the oversion of the recovery			
	<u></u>	consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whaitua or subcatchment.			
olicy P7: Uses of and and water (b) and (h)	(b) treatment, wastewate	treatment, dilution and disposal of wastewater and stormwater, and	Amend	(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.	Add diffuse contaminants to (b)
	(h) irrig	(h) irrigation and stock water, and	support	We are pleased to see irrigation get a special mention.	retain
Policy P11: In- stream water storage	The benefits assortion of water wirecognised when:	The benefits associated with the damming and storing of water within the bed of a river are recognised when:	support		retain
	<u>©</u>	there are significant social and economic benefits for the region, and			
	(р)	water remains available for multiple in-stream and out of stream uses concurrently, and			
	(e)	the reliability of water supply improves as a result, and			
	(f)	the damming and storage of water contributes to the			

	efficient allocation and use of water.			
olicy P107; ramework for aking and using rater	ork for	amend	The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.	(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence linsert (d) when schedule P changes; -ve effect on consent holders – 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately."
	(c) minimum flows or water levels are managed in accordance with the Plan provisions.			
Policy P109: Lapse lates affecting vater takes	Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.	support	We support the use of water	
olicy P111: Water akes at minimum	The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whaitua chapters (chapters 7-	Amend	Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising	Category A groundwater which shall be required to reduce take by 50% of the amount consented

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takes below minimum flows and take levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.	As above The section 32 analysis for moving from a cease take position to 50% reduction in takes.	Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels	
takes below minimum fidevels)(d) on restrictions should be changed to reinterference with surface likelihood of aquifer storrate at different distance water. A practical time is allowed before take is re	×1, 9,5,0,0		
11), with the exception that water is available below minimum flows : (c)as authorised by resource consents in accordance with Policy P108.	(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and	(c)permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:	(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and
ows and water vels	olicy P115: Authorising takes below minimum lows and lake evels d) and (Q) i		

Retain	retain	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the plan-being-made-operative renewal of consent to meet the criteria"
		The investment in infrastructure is considerable and time is required to implement changes
Support	support	amend
Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whaitua chapters of the Plan (chapters 7, 8 and 10) is exceeded.	In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.	The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of. (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing users replacing have a period of four years from the date of the plan being made
olicy P116: 'eallocating water	Policy P117: Supplementary allocation amounts at flows above the nedian flow	Solicy P118: Reasonable and Afficient use

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	operative to meet the criteria, and		
nused water	er allo y be re isting ction r er can er can	Support	Retain
	(a) a capital experiume programme linked to the purpose water is used for, and		
	(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).		
olicy P120: faking water for itorage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support	Retain
olicy P128: Transfer of esource consents	The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided:	Support	retain
	(a) the adverse effects of the take and use of transferred water are the same or less, and		

					Make this rule <u>restricted discretionary</u>		
					The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal		
					amend	amend	
(b) the transfer occurs within the same catchment management unit, and	(c) the same or a lesser amount of water is being taken or used, and	(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and	(e) the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).		The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.	The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of	
				<u>Rules</u>	Rule R135: Seneral rule for alking, use, tramming and liverting water – siscretionary	Rule R137: Farm	

id milk-cooling ster – permitted stivity	farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:		(b) delete words after "property." Leaving this in is anti growth and development and not in the best interests	(b) the total take shall be no more than 70L peday per stock unit based on the maximum herd size on the property at any-time
·	(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and		of the Wairarapa	during-the-three-years-prior to the date-of- public-notification of the Proposed-Natural Resources-Plan (31.07.2015), and Note
	Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.			Water taken for farm dairy washdown and cooling water may be taken in addition to water taken unde Rule R136. In respect of condition (b) the Wellington Regional
	In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.			council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.
Rule R143; emporary water sermit transfers – controlled activity	The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:	amend	Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled	Delete Centrolled and make this rule a <u>permitted</u> activity
Rule R144: Transferring water Permits – restricted Ilscretionary ctivity	The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:	support		retain
Other methods				

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Vairarapa water sces	Wellington Regiona Wairarapa district c characterise the hy and the social, herit Wairarapa water raoptions for the water management option to:	Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:	amend	The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.	In opening paragraph insert after cultural values and economic values of the Wairarapa water races
Method M18: Water use groups	Wellington Regional Council will: (a) support wate voluntary agn water users, the manage alloc support wate assist with wate assist with wate times of restricts and and	support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
	9	provide, where available, accurate technical information to assist user groups.			
Method M19: Water nanagement (d)	(þ)	promoting alternatives to the use of water races, and	amend	Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.	Change wording of (d) to quantify costs and benefits of water races and explore alternatives
Method M28: Development of yood management practice guidelines.	Wellington Regions develop practices, I rules) in collaborati organisations and s	Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the	support	good method esp. the use of the words "collaboration with industry"	retain

positive move which will have farmers moving forward in their practices with the reg. council??	amend important that the effects are measured, on aquatic on aquatic	Oppose Again the categories need empirical verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly.	Oppose The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation imit which is inconsistent with consented and sustainable allocation which can occur from the water sources.
implementation of policies which rely on good management practice to achieve desired environmental outcomes.	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	Water allocation amounts Op	Surface and groundwater allocation amounts Op
	tuamahanga Vhaitua Volicy R.P3: Sumulative effects on river reaches of allocating water	-igures 7.3 – 7.8	<u>Fables 7.3 – 7.5</u>

Needs empirical calibration by GW	Remove sentence the model must reliably predict annual irrigation volume within an accuracy of 15% Add after field validated model – for Wairarapa conditions	(a) add after 80% - <u>where practicable.</u>
Needs empirical calibration by GW The connectivity between various ground water takes and surface water has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.	Remove sentence "the model must reliably predict annual irrigation volume within an accuracy of 15%." Unreasonable for the Wairarapa because of dramatic seasonal weather variations. Wairarapa conditions differ from the rest of the country. This needs to be recognised. More consultation with affected parties is required.	irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed
esoddo	Amend	amend
	Irrigation A resource consent application to take water for irrigation purposes shall include an assessment using a field validated model that considers land use, crop water use requirements, on-site physical factors such as soil water holding capacity, and climatic factors such as rainfall variability and potential evapo-transpiration. The model must reliably predict annual irrigation volume within an accuracy of 15%. The annual volume calculated using the model shall meet with the following oriteria:	(a) an irrigation application efficiency of 80%, and (b) demand conditions that occur in nine out of 10 years.
inedules inedule P: assifying and anaging oundwater and irface water innectivity	chedule Q: Reasonable and fficient use criteria	

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	Add after health needs of people - stock drinking water and rootstock protection	Table R1 is interim GW to consult with water users				
Schedule R – guideline for stepdown allocations – good schedule and good use of user groups	However needs of stock drinking water and rootstock protection needs acknowledging	However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish	in consultation with water users.	As water is cleaned up the minimum flow requirement for dilution is lower.	The effects of low flows needs to demonstrated as are the effects of restrictions	There also needs to be room for the Whaitua to have their input
Support with amendments						
When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.	Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river	flows. Typically, the reduction in water take that may be required will be half the consented amount.	Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by	a water user group. In other rivers, stepdown allocations may be agreed by a water user group, or in the absence of agreement or such a group.	may be implemented by the Wellington Regional Council.	
chedule R: uideline for	lecations					

Table R1: Stepdown allocations for rivers in the Ruamahanga River catchment

Ríver	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which takes shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamähanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.

Proposed Natural Resources Plan:

Submitter:

Beryl Stuart

Submitter Number:

S426



Submission on the Proposed Natural Resources Plan for the Weilington R

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:

Send to:

regionalplan@gw.govt.nz

Your details:

Full name:

Beryl Masters Stuart

Company name:

Woodleigh Farm Trust

Address1:

107 Manuka Street

Address2:

Address3:

Dairy Number 46505

Address4:

Town

Masterton

Postcode:

5810

Telephone Work:

Telephone Home:

06 377 1280

Telephone Cell:

027 688 4245

Email address:

berylslot@xtra.co.nz

Trade competition

I/we could not gain an advantage in trade competition through this submission

I/we could gain an advantage in trade competition through this submission.

If you could gain an advantage please complete one of the following:

I/we are directly affected by an effect of the subject matter of my submission that adversand does not relate to trade competition or the effects of trade competition.

I/we are not directly affected by an effect of the subject matter of my submission that adand does not relate to trade competition or the effects of trade competition.

Attendance and wish to be heard at hearing(s)

I/we do wish to be heard in support of my/your submission [Note: this means that you wish to speak in support of your submission at the hearing(s).] I/we do not wish to be heard in support of my/our submission [Note: this means that you cannot speak at the hearing. However, you will still retain your any decision made by the Wellington Regional Council to the Environment Court.]

If other make a similar submission, I will consider presenting a joint case with them at a hi

Date:

22/10/2015

Submission on Greater Wellington Proposed Natural Resources Plan

To: Chief Executive, Greater Wellington Regional Council

1. This is a submission from:

Submitter Details:

Craig Dairy Farm Ltd

This submission is also supported by the following parties;

- Gary James Daysh and Anne Marie Daysh (112 Hururua Rd, Caterton RD 1)
- Lewis Herrich (1513 State Highway 53, Martinborough)
- Blair Percy (36 Masterton Stronvar Road, Masterton)
- Sandra Joy Shivas (28 Mangatarere Rd, Carterton RD 1)
- James and Jane Smallwood (19 Homestead Lane, Greytown)
- N & S Terry (Richmond Road, Carterton)
- Ali Scott & Dion Kilmister (1665 Te Ore Ore Bideford Road, Masterton RD11)
- AB & DE Smith (60 Chester Road, Carterton)
- Beryl Masters Stuart (107 Manuka Street, Masterton 5810)
- Garry Daniell (Te Ore Ore Road)

A contact address sheet is provided for each of these parties as attached to the submission.

Submitter Contact:

Ray Craig

Submitter Postal Address:

144 Lincoln Road, Carterton 5713

Address for service:

C/- Opus International Consultants Ltd

PO Box 12 003 Wellington 6144

Attention: Nicholas Cooper

Phone: 04-471-7120

Nicholas.Cooper@opus.co.nz

Trade Competition

I/we could not gain an advantage in trade competition through this submission [If you ticked this box, delete the rest of this section and go straight to Your submission']

Submission

- 2. This is a submission on the Proposed Natural Resource Plan for the Greater Wellington Regional Council
- 3. The specific provisions of the proposal that this submission relates to are:

The specific provisions of the proposed NRP that the submission relates to are in terms of;

A. Accuracy of nomenclature and identification of the Groundwater community drinking water supply protection areas – Wairarapa Map 27a.

With regard to the Groundwater community drinking water supply protection areas on Map 27a there are a number of concerns are identified:

- Map 27a is entitled "Groundwater community drinking water supply protection areas –
 Wairarapa (incorporates Schedule M2). Within Map 27a there are identified 'Groundwater
 supply well', and 'Groundwater supply protection area'. Map 27a does not identify
 'community drinking water' supply protection areas.
- The proposed defaulting of activities (currently permitted) such as the application of agrichemical (rule 36), the discharge of collected animal effluent (rule 83), or farm refuse dumps (rule 89) to discretionary or restricted discretionary activities where on land within an identified community drinking water supply protection area creates an uncertainty for the current landowner or operator in regard to future land use and management options.

Identifying that those uses are not permitted within the 'groundwater community drink water supply protection area' unduly penalises those landowners or operators within the protection area without identifying an actual environmental problem or adverse effect to avoided, remedied or mitigated.

• The Proposed NRP Section 32 Report for Discharges to Land in Section 5 "Efficiency and Effectiveness" discusses managing effects on drinking water supplies (5.1), rural waste (5.3), manufacture and storage of silage and compost (5.4), and collected animal effluent (5.5). The only specific data about groundwater for the Wairarapa cited is the region wide study relating to groundwater capture zones by GNS Science (Toews and Donath, 2015). Section 5.1 on page 17 states

Taking a precautionary approach (in accordance with Policy P3 of the proposed Plan) in protecting sources of community drinking water is generally more effective and less costly than trying to counteract the impacts of contamination after the occurrence. Uncertainty about how well the mapped zones reflect actual contaminant pathways and channel characteristics (and therefore risk), will always be present, and especially so in the vicinity of minor tributaries. However, the extent of the protection zones should be reviewed and refined over time as knowledge and methodologies improve. An external peer review has confirmed that the approach to identifying zones around the drinking water supplies as protections areas, was appropriate and defensible (Potts 2015).

This approach is based upon Policy 69 which states;

Policy P69: Human drinking water supplies
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 practicable. Where adverse effects cannot be avoided, the adverse effects shall
be managed having particular regard to:

Further in section 5.1 it is referenced that Policy 69 directs the management of 'adverse' effects on human drinking water supplies by

"...conditions have been included on rules for specific discharges to land activities including farm refuse dumps, offal pits..." and,

A default protection zone as an 'alert' or 'filtering' mechanism has been identified. This can be seen in proposed Rules R71-R73 and Rule R89, which include a provision that

restricts otherwise permitted activities to occur within a community drinking water supply protection area as identified in Maps 26-27.

The justification for Policy 69 is in the second to last paragraph of 5.1 where it is stated at the bottom of page 17;

Proposed Policy P69 is followed by a note explaining that sections 7 and 8 of the NES-Drinking Water limit the ability of a regional council to grant consent to activities within community supply protection areas.

There are no specific problems regarding water quality, and a link between land use and water quality, has been identified in the area affected by Schedule M2.

Under the discussion relating to rural waste (Section 5.2.2 of the PNRP Section 32 report: Discharges to land) pages 22 it is stated;

Agriculture plays a role in the economic and social well-being in the Wellington Region, primarily in the Wairarapa but also in the rest of the region. Farming practices produce a variety of waste streams from construction waste (timber and metal) and hazardous wastes (agrichemicals and paints), to household organic food scrap waste and dead animals. It is important to ensure that waste management options are available to enable rural landowners not only to minimise their waste, but also to divert or dispose of it in a sustainable manner.

In terms of farm rural waste and assessing whether there are adverse environmental effects occurring within the Wairapapa, or the community supply protection areas specifically,

"The volume of waste ending up in farm dumps in the Wellington Region is not known...",

However in the Section 32 Report it is discussed that using data from a study of farm dump disposal in the Waikato and Bay of Plenty regions suggests that a volume of 65,453 tonnes of rural waste annually (Section 5.3.1, page 24 of Section 32: Discharges to Land) is being disposed of within the region. But there is no quantification by the Section 32 report in terms of environmental problems resulting from farm refuse other than a statement (Section 5.3.1 page 24);

"WRC incident reporting shows that inappropriate contents and location of farm refuse dumps has led to environmental contamination in a number of cases."

This doesn't indicate whether farm refuse dumps are an increasing environment problem or whether the dumps have a problem in relation to groundwater and potable water for a community supply.

This submission questions whether the *community supply protection areas* have been identified adequately to impose restriction upon land users where there is no record established of an adverse effect occurring.

- A report on water quality, the Ministry of Health Annual Report on Drinking Water Quality (2013-2014) indicate that there is no problem which requires management.
- The use of a regional-scale model, with inherent assumptions and generalisations, to predict the behaviour at specific bores and locations. While the availability of hydrogeological data may be appropriate to support a regional-scale model, considerable local variation exists. As stated in GNS (2015) "The models were never calibrated as groundwater transport models" and "Because the groundwater models were not calibrated as transport models, the travel times of particle path lines may not be accurate; however, their flow pathways should remain the same." Consequently, at specific locations there will be significant differences

between the assumed/modelled conditions and the actual situation. Any default classification, such as schedule M2, therefore must not be overly restrictive.

- There is a lack of empirical calibration or validation of the model. The available data suggests that the model is either inappropriate or that there is no problem to be addressed. In addition: "The mapped zones in this report (GNS, 2015) are conservative in the sense that their size and shape consider a wide range of uncertainties. The boundaries do not mark absolute boundaries of the CZs and PZs, and as such, may delineate zones that may not contribute groundwater to wells. Some of the uncertainty analysis runs, for instance, may not realistically portray groundwater flow, and as a result would map a zone larger than it should be."
- The adoption of conservative, and potentially non-validated capture zones. This is acknowledged within the report upon which the extents of the capture zones are based (GNS, 2015).
- The adoption of the default capture zones, with no empirical support or justification, will place the onus on the landowner to show that they are not causing a problem. The available evidence suggests that there is not actually a problem to be addressed.
- There is no economic assessment of the costs of imposing the proposed capture zones on existing and lawful land use activities. There may be potentially substantial direct and indirect costs and restrictions imposed on landowners. The Section 32 Report has not weighed these against any benefits from 'managing' a national issue, rather than quantifying and determining the extent of the potential scale at the issue within Greater Wellington.
- B. Rules of the Proposed Natural Resources Plan being;

With regard to farming activities within the Groundwater Supply Protection Areas this submission comments on the following rules of the PNRP

- Rule 36: Agrichemicals permitted activity
- Rule R83: Discharge of collected animal effluent onto or into land controlled activity
- Rule R89: Farm refuse dumps permitted activity
- Rule R90: Manufacture and storage of silage and compost permitted activity
- Rule 92: All discharges to land within community drinking water supply protection areas restricted discretionary activity
- Rule R94: Cultivation or tilling of land permitted activity
- Rule R95: Break-feeding permitted activity
- Rule R96: Cultivation and break-feeding discretionary activity
- Rule R121: Maintenance of drains permitted activity
- Rule R122: Removing vegetation permitted activity

4. The submission is:

The submission is that the rules identified above are to be amended and or deleted as detailed within section 5 below.

5. The submitter seeks the following decision from Greater Wellington Regional Council:

Table of Submitter Requested Changes

Specific Provision	Request	Reason
Rule 36: Agrichemicals – permitted activity	Relief sought Amend the rule. Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.	The inclusion of criteria (e) does not address any known or identified problem. It does not reflect the available information and data on the water quality of Wairarapa potable water supplies (Ministry of Health, 2013-2014). There is no region specific evidence of a risk to community drinking water supply from the activity described by rule 36. The other criteria under the PNRP rule 36 aside from (e), being criteria (g) through to (o) can equally provide for the safe application of agrichemical in a manner that avoids adverse effects upon land within a community drinking water supply area.
Rule R83: Discharge of collected animal effluent onto or into land – controlled activity	Relief sought Amend the rule by deleting condition (e)(iii).	Rule R83 is supported in principle as a sensible approach to managing the effects of dairy farm effluent. However, the submitter is concerned that the identification of the community drinking water supply protection area as shown on map 26 and 27a is faulty and therefore landowners are required by condition (e)(iii) to go through a resource consent process even if the activity is outside the protection area.

Specific Provision	Request	Reason
Rule R89: Farm refuse dumps – permitted activity	Relief sought Amend the rule by deleting condition (d)(iii).	The submitter seeks that rule 89 is amended to remove criterion (d)(iii). The PNRP Section 32 on Discharges to Land report does not have evidence at a regional level that this activity is creating a problem for the Groundwater community drinking water supply protection areas. Policy 69 is basing the implementation of Rule 89 on a precautionary approach but has not quantified the costs of doing so. There is also considerable uncertainty regarding the delineation of the groundwater capture zones based on work undertaken by GNS (Toews and Donarth 2015).
Rule R90: Manufacture and storage of silage and compost – permitted activity	Relief sought Amend condition (d) of the rule by inserting the word "permanent" in front of 'silage storage area' as follows; (d) the walls and floor of a permanent silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and Or any other equivalent change	Condition (d) requiring that all silage areas are lined is not justified. The submitter considers that lining is appropriate for permanent silage storage pits which are used on an ongoing basis. It is not appropriate for temporary silage storage which may only be in use when there is a sufficient additional material for silage that cannot be accommodated by the existing permanent pit. It is suggested that if required, temporary could be defined as being used only once per 4 years (48months). At that frequency of use any silage leachate emanating from a temporary pit would be broken down by biological and chemical soil/ground processes.
Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity	Relief sought Request that the rule be deleted. Or any other equivalent	Based upon the information collected for GWRC by GNS Science (Toews and Donath, 2015) and the information collected by the Ministry of Health (Ministry of Health

Specific Provision	Request	Reason
	change	2013-2014) it is not clear that the land discharge activity is a problem for the Groundwater supply wells or that or that the Groundwater community drinking water supply protection areas are defined appropriately. If these points are correct the rule is being unfairly applied without due recognition of the costs imposed on those parties who will have to comply with the rule. This is in terms of what level of evidence would be required for a consent application under rule 92 to determine that any effects on community drinking water supply water quality are not more than minor?
Rule R94: Cultivation or tilling of land – permitted activity	Relief sought Amend the rule in relation to condition (a) as follows; (a) cultivation-shall not occur within 5m of a surface water body for those surface water bodies with a wetted channel width of greater than 2m of wetted channel. Add new condition as follows; (xx) cultivation shall not occur within 2m of a surface water body with a wetted channel width of less than 2m. Or any other equivalent change	The intent of the rule is to avoid the contamination of surface water bodies by sediment laden run off occurring as a result of cultivation activity. The use of a 5m setback is just a default provision. The information contained in the PNRP Section 32 report discussing the efficiency and effectiveness for livestock access, break-feeding and cultivation highlights various research (Section 5.3, pages 35-36) on the movement of course or fine contaminant particle flows to water, various setback distances and the influence of vegetation.

Specific Provision	Request	Reason
Rule R95: Break-feeding – permitted activity	Relief sought Amend the rule in relation to condition (a) as follows; (a)-break-feeding shall not occur within 5m of a surface water body for those surface water bodies with a wetted channel width of greater than 2m of wetted channel. Add new condition as follows; (xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m. Or any other equivalent change	The submitter considers it is impractical to apply 5m setback to break feeding around small surface water bodies such as farm drains which may completely enclose a fam paddock.
Rule R121: Maintenance of drains – permitted activity	Relief sought Amend the rule in terms of inserting a new condition; (XX) all tools and mechanical devices used for drain clearing must be inspected and cleaned to remove any pest plants or fragments of pest plants, or pest animals before and after use, to prevent the spread of pests. and amend to the following conditions; (g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket with a curved flat base, and a slatted back that permits the easy drainage of water and fish back into the drain which reduces the likelihood of pest plant	Supports in principle Rule R121, which permits the removal of vegetation or bed material and associated sediment from any drain or highly modified river or stream, as this is an appropriate status for these activities. Good practice for managing the control of pest plant and animals species is for all machinery to be inspected and if needed, cleaned before machinery or equipment is used in any waterway, including drains. Cleaning should also take place after use and before moving to another location. Machinery should not allow the return of pest plants to a drain, particularly where maintenance activity results in fragments of pest plants being returned to a drain. Such an activity is likely to cause the spread of pest

Specific Provision	Request	Reason
	material being spread through the drain, and (j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted Organism under the Biosecurity Act 1993), and	plants, and where the pest plants are Unwanted Organisms (UO's) under the Biosecurity Act 1993, this is a breach of the Act.
	Or any other equivalent change	
Rule R122: Removing vegetation — permitted activity	Relief sought Amend the rule in terms of the changes to the following conditions; (h) if mechanically clearing aquatic vegetation from an area of river or lake bed covered with water, the machinery must use a weed bucket with a curved flat base, and a slatted back-that permits the easy drainage of water and fish back into the drain and which reduces the likelihood of pest plant material being spread through the river, and	Same reason as for Rule 121.
	(j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted	

Specific Provision	Request	Reason	
	Organism under the Biosecurity Act 1993), and		
	Or any other equivalent change		

- 6. The submitter wishes $\frac{1}{2}$ does not wish to be heard in support of its submission
- 7. If others make a similar submission the submitter does / does not want to present a joint case at a hearing.

Signature of submitter 9/5 Go Date 22 OCTOBER 2015
RAYMOND BRIAN CRAIG

Proposed Natural Resources Plan:

Submitter:

AB & DE Smith

Submitter Number:

S427

Submission on the Proposed Natural Resources Plan for the Wellington R

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:

Send to:

regionalplan@gw.govt.nz

Your details:

Full name:

AB & DE Smith

Company name:

Leyden Downs Ltd

Address1:

60 Chester Road

Address2:

RD 1

Address3:

Address4:

Town

Carterton

Postcode:

Telephone Work:

06 379 9202

Telephone Home: Telephone Cell: Email address:

Trade competition

V I/we could not gain an advantage in trade competition through this submission

x I/we could gain an advantage in trade competition through this submission.

If you could gain an advantage please complete one of the following:

I/we are directly affected by an effect of the subject matter of my submission that adversand does not relate to trade competition or the effects of trade competition.

I/we are not directly affected by an effect of the subject matter of my submission that advand does not relate to trade competition or the effects of trade competition.

Attendance and wish to be heard at hearing(s)

I/we do wish to be heard in support of my/your submission [Note: this means that you wish to speak in support of your submission at the hearing(s).]
I/we do not wish to be heard in support of my/our submission
[Note: this means that you cannot speak at the hearing. However, you will still retain your any decision made by the Wellington Regional Council to the Environment Court.]

V If other make a similar submission, I will consider presenting a joint case with them at a hi

Date:

22/10/2015



Submission on Greater Wellington Proposed Natural Resources Plan

To: Chief Executive, Greater Wellington Regional Council

1. This is a submission from:

Submitter Details:

Craig Dairy Farm Ltd

This submission is also supported by the following parties:

- Gary James Daysh and Anne Marie Daysh (112 Hururua Rd, Caterton RD 1)
- Lewis Herrich (1513 State Highway 53, Martinborough)
- Blair Percy (36 Masterton Stronvar Road, Masterton)
- Sandra Joy Shivas (28 Mangatarere Rd, Carterton RD 1)
- James and Jane Smallwood (19 Homestead Lane, Greytown)
- N & S Terry (Richmond Road, Carterton)
- Ali Scott & Dion Kilmister (1665 Te Ore Ore Bideford Road, Masterton RD11)
- AB & DE Smith (60 Chester Road, Carterton)
- Beryl Masters Stuart (107 Manuka Street, Masterton 5810)
- Garry Daniell (Te Ore Ore Road)

A contact address sheet is provided for each of these parties as attached to the submission.

Submitter Contact:

Ray Craig

Submitter Postal Address:

144 Lincoln Road, Carterton 5713

Address for service:

C/- Opus International Consultants Ltd

PO Box 12 003 Wellington 6144

Attention: Nicholas Cooper

Phone: 04-471-7120

Nicholas.Cooper@opus.co.nz

Trade Competition

I/we **could not** gain an advantage in trade competition through this submission [If you ticked this box, delete the rest of this section and go straight to 'Your submission']

Submission

- 2. This is a submission on the Proposed Natural Resource Plan for the Greater Wellington Regional Council
- 3. The specific provisions of the proposal that this submission relates to are:

The specific provisions of the proposed NRP that the submission relates to are in terms of;

A. Accuracy of nomenclature and identification of the Groundwater community drinking water supply protection areas – Wairarapa Map 27a.

With regard to the Groundwater community drinking water supply protection areas on Map 27a there are a number of concerns are identified:

- Map 27a is entitled "Groundwater community drinking water supply protection areas Wairarapa (incorporates Schedule M2). Within Map 27a there are identified 'Groundwater supply well', and 'Groundwater supply protection area'. Map 27a does not identify 'community drinking water' supply protection areas.
- The proposed defaulting of activities (currently permitted) such as the application of agrichemical (rule 36), the discharge of collected animal effluent (rule 83), or farm refuse dumps (rule 89) to discretionary or restricted discretionary activities where on land within an identified community drinking water supply protection area creates an uncertainty for the current landowner or operator in regard to future land use and management options.

Identifying that those uses are not permitted within the 'groundwater community drink water supply protection area' unduly penalises those landowners or operators within the protection area without identifying an actual environmental problem or adverse effect to avoided, remedied or mitigated.

• The Proposed NRP Section 32 Report for Discharges to Land in Section 5 "Efficiency and Effectiveness" discusses managing effects on drinking water supplies (5.1), rural waste (5.3), manufacture and storage of silage and compost (5.4), and collected animal effluent (5.5). The only specific data about groundwater for the Wairarapa cited is the region wide study relating to groundwater capture zones by GNS Science (Toews and Donath, 2015). Section 5.1 on page 17 states

Taking a precautionary approach (in accordance with Policy P3 of the proposed Plan) in protecting sources of community drinking water is generally more effective and less costly than trying to counteract the impacts of contamination after the occurrence. Uncertainty about how well the mapped zones reflect actual contaminant pathways and channel characteristics (and therefore risk), will always be present, and especially so in the vicinity of minor tributaries. However, the extent of the protection zones should be reviewed and refined over time as knowledge and methodologies improve. An external peer review has confirmed that the approach to identifying zones around the drinking water supplies as protections areas, was appropriate and defensible (Potts 2015).

This approach is based upon Policy 69 which states;

Policy P69: Human drinking water supplies
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 practicable. Where adverse effects cannot be avoided, the adverse effects shall
be managed having particular regard to:

Further in section 5.1 it is referenced that Policy 69 directs the management of 'adverse' effects on human drinking water supplies by

"...conditions have been included on rules for specific discharges to land activities including farm refuse dumps, offal pits...." and,

A default protection zone as an 'alert' or 'filtering' mechanism has been identified. This can be seen in proposed Rules R71-R73 and Rule R89, which include a provision that

restricts otherwise permitted activities to occur within a community drinking water supply protection area as identified in Maps 26-27.

The justification for Policy 69 is in the second to last paragraph of 5.1 where it is stated at the bottom of page 17;

Proposed Policy P69 is followed by a note explaining that sections 7 and 8 of the NES-Drinking Water limit the ability of a regional council to grant consent to activities within community supply protection areas.

There are no specific problems regarding water quality, and a link between land use and water quality, has been identified in the area affected by Schedule M2.

Under the discussion relating to rural waste (Section 5.2.2 of the PNRP Section 32 report: Discharges to land) pages 22 it is stated;

Agriculture plays a role in the economic and social well-being in the Wellington Region, primarily in the Wairarapa but also in the rest of the region. Farming practices produce a variety of waste streams from construction waste (timber and metal) and hazardous wastes (agrichemicals and paints), to household organic food scrap waste and dead animals. It is important to ensure that waste management options are available to enable rural landowners not only to minimise their waste, but also to divert or dispose of it in a sustainable manner.

In terms of farm rural waste and assessing whether there are adverse environmental effects occurring within the Wairapapa, or the community supply protection areas specifically,

"The volume of waste ending up in farm dumps in the Wellington Region is not known...".

However in the Section 32 Report it is discussed that using data from a study of farm dump disposal in the Waikato and Bay of Plenty regions suggests that a volume of 65,453 tonnes of rural waste annually (Section 5.3.1, page 24 of Section 32: Discharges to Land) is being disposed of within the region. But there is no quantification by the Section 32 report in terms of environmental problems resulting from farm refuse other than a statement (Section 5.3.1 page 24);

"WRC incident reporting shows that inappropriate contents and location of farm refuse dumps has led to environmental contamination in a number of cases."

This doesn't indicate whether farm refuse dumps are an increasing environment problem or whether the dumps have a problem in relation to groundwater and potable water for a community supply.

This submission questions whether the *community supply protection areas* have been identified adequately to impose restriction upon land users where there is no record established of an adverse effect occurring.

- A report on water quality, the Ministry of Health *Annual Report on Drinking Water Quality* (2013-2014) indicate that there is no problem which requires management.
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between the assumed/modelled conditions and the actual situation. Any default classification, such as schedule M2, therefore must not be overly restrictive.

- There is a lack of empirical calibration or validation of the model. The available data suggests that the model is either inappropriate or that there is no problem to be addressed. In addition: "The mapped zones in this report (GNS, 2015) are conservative in the sense that their size and shape consider a wide range of uncertainties. The boundaries do not mark absolute boundaries of the CZs and PZs, and as such, may delineate zones that may not contribute groundwater to wells. Some of the uncertainty analysis runs, for instance, may not realistically portray groundwater flow, and as a result would map a zone larger than it should be."
- The adoption of conservative, and potentially non-validated capture zones. This is acknowledged within the report upon which the extents of the capture zones are based (GNS, 2015).
- The adoption of the default capture zones, with no empirical support or justification, will place the onus on the landowner to show that they are not causing a problem. The available evidence suggests that there is not actually a problem to be addressed.
- There is no economic assessment of the costs of imposing the proposed capture zones on existing and lawful land use activities. There may be potentially substantial direct and indirect costs and restrictions imposed on landowners. The Section 32 Report has not weighed these against any benefits from 'managing' a national issue, rather than quantifying and determining the extent of the potential scale at the issue within Greater Wellington.
- B. Rules of the Proposed Natural Resources Plan being;

With regard to farming activities within the Groundwater Supply Protection Areas this submission comments on the following rules of the PNRP

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- Rule R122: Removing vegetation permitted activity

4. The submission is:

The submission is that the rules identified above are to be amended and or deleted as detailed within section 5 below.

5. The submitter seeks the following decision from Greater Wellington Regional Council:

Table of Submitter Requested Changes

Specific Provision	Request	Reason
Rule 36: Agrichemicals – permitted activity	Relief sought Amend the rule. Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.	The inclusion of criteria (e) does not address any known or identified problem. It does not reflect the available information and data on the water quality of Wairarapa potable water supplies (Ministry of Health, 2013-2014). There is no region specific evidence of a risk to community drinking water supply from the activity described by rule 36. The other criteria under the PNRP rule 36 aside from (e), being criteria (g) through to (o) can equally provide for the safe application of agrichemical in a manner that avoids adverse effects upon land within a community drinking water supply area.
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Specific Provision	Request	Reason
Rule R89: Farm refuse dumps – permitted activity	Relief sought Amend the rule by deleting condition (d)(iii).	The submitter seeks that rule 89 is amended to remove criterion (d)(iii). The PNRP Section 32 on Discharges to Land report does not have evidence at a regional level that this activity is creating a problem for the Groundwater community drinking water supply protection areas. Policy 69 is basing the implementation of Rule 89 on a precautionary approach but has not quantified the costs of doing so. There is also considerable uncertainty regarding the delineation of the groundwater capture zones based on work undertaken by GNS (Toews and Donarth 2015).
Rule R90: Manufacture and storage of silage and compost – permitted activity	Relief sought Amend condition (d) of the rule by inserting the word "permanent" in front of 'silage storage area' as follows; (d) the walls and floor of a permanent silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and Or any other equivalent change	Condition (d) requiring that all silage areas are lined is not justified. The submitter considers that lining is appropriate for permanent silage storage pits which are used on an ongoing basis. It is not appropriate for temporary silage storage which may only be in use when there is a sufficient additional material for silage that cannot be accommodated by the existing permanent pit. It is suggested that if required, temporary could be defined as being used only once per 4 years (48months). At that frequency of use any silage leachate emanating from a temporary pit would be broken down by biological and chemical soil/ground processes.
Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity	Relief sought Request that the rule be deleted. Or any other equivalent	Based upon the information collected for GWRC by GNS Science (Toews and Donath, 2015) and the information collected by the Ministry of Health (Ministry of Health

Specific Provision	Request	Reason
	change	2013-2014) it is not clear that the land discharge activity is a problem for the Groundwater supply wells or that or that the Groundwater community drinking water supply protection areas are defined appropriately. If these points are correct the rule is being unfairly applied without due recognition of the costs imposed on those parties who will have to comply with the rule. This is in terms of what level of evidence would be required for a consent application under rule 92 to determine that any effects on community drinking water supply water quality are not more than minor?
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Specific Provision	Request	Reason
Rule R95: Break-feeding – permitted activity	Relief sought Amend the rule in relation to condition (a) as follows; (a)-break-feeding shall not occur within 5m of a surface water body for those surface water bodies with a wetted channel width of greater than 2m of wetted channel, Add new condition as follows; (xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m. Or any other equivalent change	The submitter considers it is impractical to apply 5m setback to break feeding around small surface water bodies such as farm drains which may completely enclose a fam paddock.
Rule R121: Maintenance of drains – permitted activity	Relief sought Amend the rule in terms of inserting a new condition; (XX) all tools and mechanical devices used for drain clearing must be inspected and cleaned to remove any pest plants or fragments of pest plants, or pest animals before and after use, to prevent the spread of pests. and amend to the following conditions; (g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket with a curved flat base, and a slatted back that permits the easy drainage of water and fish back into the drain which reduces the likelihood of pest plant	Supports in principle Rule R121 which permits the removal of vegetation or bed material and associated sediment from any drain or highly modified river or stream, as this is an appropriate status for these activities. Good practice for managing th control of pest plant an animals species is for a machinery to be inspected and needed, cleaned befor machinery or equipment is use in any waterway, includin drains. Cleaning should als take place after use and befor moving to another location. Machinery should not allow th return of pest plants to a drain particularly where maintenanc activity results in fragments of pest plants being returned to drain. Such an activity is likel to cause the spread of per

Specific Provision	Request	Reason
	material being spread through the drain, and (j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted Organism under the Biosecurity Act 1993), and Or any other equivalent	plants, and where the pest plants are Unwanted Organisms (UO's) under the Biosecurity Act 1993, this is a breach of the Act. Similarly any actions that cause the spread of pest animals, including pest fish that are UOs is a breach of the Act.
	change	A STATE OF THE STA
Rule R122: Removing vegetation – permitted activity	Amend the rule in terms of the changes to the following conditions; (h) if mechanically clearing aquatic vegetation from an area of river or lake bed covered with water, the machinery must use a weed bucket with a curved flat base, and a slatted back that permits the easy drainage of water and fish back into the drain and which reduces the likelihood of pest plant material being spread through the river, and	Same reason as for Rule 121.
	(j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted	

Specific Provision	Request	Reason	
	Organism under the Biosecurity Act 1993), and		
	Or any other equivalent change		

- 6. The submitter wishes + does not wish to be heard in support of its submission
- 7. If others make a similar submission the submitter does / does not want to present a joint case at a hearing.

Signature of submitter GLAGO Date 22 OCTOBER 2015

RAYMOND BRIAN CHAIG



Proposed Natural Resources Plan:

Submitter:

James and Jane Smallwood

Submitter Number:

S428

Submission on the Proposed Natural Resources Plan for the Wellington R

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:

Send to:

regionalplan@gw.govt.nz

Your details:

Full name:

James and Jane Smallwood

Company name:

Berwick Holdings Ltd & Smallwood Family Trust

Address1:

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Address2:

Address3: Address4:

Town

Greytown

Postcode:

Telephone Work:

Telephone Home:

61393782799

Telephone Cell:

Email address:

berwick.farm@yahoo.com

Trade competition

γες

I/we could not gain an advantage in trade competition through this submission

No

I/we could gain an advantage in trade competition through this submission.

If you could gain an advantage please complete one of the following:

I/we are directly affected by an effect of the subject matter of my submission that advers

and does not relate to trade competition or the effects of trade competition.

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and does not relate to trade competition or the effects of trade competition.

Attendance and wish to be heard at hearing(s)

Yes

I/we do wish to be heard in support of my/your submission

[Note: this means that you wish to speak in support of your submission at the hearing(s).]

I/we do not wish to be heard in support of my/our submission

[Note: this means that you cannot speak at the hearing. However, you will still retain your

any decision made by the Wellington Regional Council to the Environment Court.]

Yes

If other make a similar submission, I will consider presenting a joint case with them at a hi

Date:

20/10/2015



Submission on Greater Wellington Proposed Natural Resources Plan

To: Chief Executive, Greater Wellington Regional Council

1. This is a submission from:

Submitter Details:

Craig Dairy Farm Ltd

This submission is also supported by the following parties:

- Gary James Daysh and Anne Marie Daysh (112 Hururua Rd, Caterton RD 1)
- Lewis Herrich (1513 State Highway 53, Martinborough)
- Blair Percy (36 Masterton Stronvar Road, Masterton)
- Sandra Joy Shivas (28 Mangatarere Rd, Carterton RD 1)
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- N & S Terry (Richmond Road, Carterton)
- Ali Scott & Dion Kilmister (1665 Te Ore Ore Bideford Road, Masterton RD11)
- AB & DE Smith (60 Chester Road, Carterton)
- Beryl Masters Stuart (107 Manuka Street, Masterton 5810)
- Garry Daniell (Te Ore Ore Road)

A contact address sheet is provided for each of these parties as attached to the submission.

Submitter Contact:

Ray Craig

Submitter Postal Address:

144 Lincoln Road, Carterton 5713

Address for service:

C/- Opus International Consultants Ltd

PO Box 12 003 Wellington 6144

Attention: Nicholas Cooper

Phone: 04-471-7120

Nicholas.Cooper@opus.co.nz

Trade Competition

☑ I/we **could not** gain an advantage in trade competition through this submission [If you ticked this box, delete the rest of this section and go straight to 'Your submission']

Submission

- 2. This is a submission on the Proposed Natural Resource Plan for the Greater Wellington Regional Council
- 3. The specific provisions of the proposal that this submission relates to are:

The specific provisions of the proposed NRP that the submission relates to are in terms of:

A. Accuracy of nomenclature and identification of the Groundwater community drinking water supply protection areas — Wairarapa Map 27a.

With regard to the Groundwater community drinking water supply protection areas on Map 27a there are a number of concerns are identified:

- Map 27a is entitled "Groundwater community drinking water supply protection areas Wairarapa (incorporates Schedule M2). Within Map 27a there are identified 'Groundwater supply well', and 'Groundwater supply protection area'. Map 27a does not identify 'community drinking water' supply protection areas.
- The proposed defaulting of activities (currently permitted) such as the application of agrichemical (rule 36), the discharge of collected animal effluent (rule 83), or farm refuse dumps (rule 89) to discretionary or restricted discretionary activities where on land within an identified community drinking water supply protection area creates an uncertainty for the current landowner or operator in regard to future land use and management options.
 - Identifying that those uses are not permitted within the 'groundwater community drink water supply protection area' unduly penalises those landowners or operators within the protection area without identifying an actual environmental problem or adverse effect to avoided, remedied or mitigated.
- The Proposed NRP Section 32 Report for Discharges to Land in Section 5 "Efficiency and Effectiveness" discusses managing effects on drinking water supplies (5.1), rural waste (5.3), manufacture and storage of silage and compost (5.4), and collected animal effluent (5.5). The only specific data about groundwater for the Wairarapa cited is the region wide study relating to groundwater capture zones by GNS Science (Toews and Donath, 2015). Section 5.1 on page 17 states

Taking a precautionary approach (in accordance with Policy P3 of the proposed Plan) in protecting sources of community drinking water is generally more effective and less costly than trying to counteract the impacts of contamination after the occurrence. Uncertainty about how well the mapped zones reflect actual contaminant pathways and channel characteristics (and therefore risk), will always be present, and especially so in the vicinity of minor tributaries. However, the extent of the protection zones should be reviewed and refined over time as knowledge and methodologies improve. An external peer review has confirmed that the approach to identifying zones around the drinking water supplies as protections areas, was appropriate and defensible (Potts 2015).

This approach is based upon Policy 69 which states;

Policy P69: Human drinking water supplies
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 practicable. Where adverse effects cannot be avoided, the adverse effects shall
be managed having particular regard to:

Further in section 5.1 it is referenced that Policy 69 directs the management of 'adverse' effects on human drinking water supplies by

'...conditions have been included on rules for specific discharges to land activities including farm refuse dumps, offal pits....' and,

A default protection zone as an 'alert' or 'filtering' mechanism has been identified. This can be seen in proposed Rules R71-R73 and Rule R89, which include a provision that

restricts otherwise permitted activities to occur within a community drinking water supply protection area as identified in Maps 26-27.

The justification for Policy 69 is in the second to last paragraph of 5.1 where it is stated at the bottom of page 17;

Proposed Policy P69 is followed by a note explaining that sections 7 and 8 of the NES-Drinking Water limit the ability of a regional council to grant consent to activities within community supply protection areas.

There are no specific problems regarding water quality, and a link between land use and water quality, has been identified in the area affected by Schedule M2.

Under the discussion relating to rural waste (Section 5.2.2 of the PNRP Section 32 report: Discharges to land) pages 22 it is stated;

Agriculture plays a role in the economic and social well-being in the Wellington Region, primarily in the Wairarapa but also in the rest of the region. Farming practices produce a variety of waste streams from construction waste (timber and metal) and hazardous wastes (agrichemicals and paints), to household organic food scrap waste and dead animals. It is important to ensure that waste management options are available to enable rural landowners not only to minimise their waste, but also to divert or dispose of it in a sustainable manner.

In terms of farm rural waste and assessing whether there are adverse environmental effects occurring within the Wairapapa, or the community supply protection areas specifically,

"The volume of waste ending up in farm dumps in the Wellington Region is not known...",

However in the Section 32 Report it is discussed that using data from a study of farm dump disposal in the Waikato and Bay of Plenty regions suggests that a volume of 65,453 tonnes of rural waste annually (Section 5.3.1, page 24 of Section 32: Discharges to Land) is being disposed of within the region. But there is no quantification by the Section 32 report in terms of environmental problems resulting from farm refuse other than a statement (Section 5.3.1 page 24);

"WRC incident reporting shows that inappropriate contents and location of farm refuse dumps has led to environmental contamination in a number of cases."

This doesn't indicate whether farm refuse dumps are an increasing environment problem or whether the dumps have a problem in relation to groundwater and potable water for a community supply.

This submission questions whether the *community supply protection areas* have been identified adequately to impose restriction upon land users where there is no record established of an adverse effect occurring.

- A report on water quality, the Ministry of Health *Annual Report on Drinking Water Quality* (2013-2014) indicate that there is no problem which requires management.
- The use of a regional-scale model, with inherent assumptions and generalisations, to predict the behaviour at specific bores and locations. While the availability of hydrogeological data may be appropriate to support a regional-scale model, considerable local variation exists. As stated in GNS (2015) "The models were never calibrated as groundwater transport models" and "Because the groundwater models were not calibrated as transport models, the travel times of particle path lines may not be accurate; however, their flow pathways should remain the same." Consequently, at specific locations there will be significant differences

between the assumed/modelled conditions and the actual situation. Any default classification, such as schedule M2, therefore must not be overly restrictive.

- There is a lack of empirical calibration or validation of the model. The available data suggests that the model is either inappropriate or that there is no problem to be addressed. In addition: "The mapped zones in this report (GNS, 2015) are conservative in the sense that their size and shape consider a wide range of uncertainties. The boundaries do not mark absolute boundaries of the CZs and PZs, and as such, may delineate zones that may not contribute groundwater to wells. Some of the uncertainty analysis runs, for instance, may not realistically portray groundwater flow, and as a result would map a zone larger than it should be."
- The adoption of conservative, and potentially non-validated capture zones. This is acknowledged within the report upon which the extents of the capture zones are based (GNS, 2015).
- The adoption of the default capture zones, with no empirical support or justification, will place the onus on the landowner to show that they are not causing a problem. The available evidence suggests that there is not actually a problem to be addressed.
- There is no economic assessment of the costs of imposing the proposed capture zones on existing and lawful land use activities. There may be potentially substantial direct and indirect costs and restrictions imposed on landowners. The Section 32 Report has not weighed these against any benefits from 'managing' a national issue, rather than quantifying and determining the extent of the potential scale at the issue within Greater Wellington.
- B. Rules of the Proposed Natural Resources Plan being;

With regard to farming activities within the Groundwater Supply Protection Areas this submission comments on the following rules of the PNRP

- Rule 36: Agrichemicals permitted activity
- Rule R83: Discharge of collected animal effluent onto or into land controlled activity
- Rule R89: Farm refuse dumps permitted activity
- Rule R90: Manufacture and storage of silage and compost permitted activity
- Rule 92: All discharges to land within community drinking water supply protection areas restricted discretionary activity
- Rule R94: Cultivation or tilling of land permitted activity
- Rule R95: Break-feeding permitted activity
- Rule R96: Cultivation and break-feeding discretionary activity
- Rule R121: Maintenance of drains permitted activity
- Rule R122: Removing vegetation permitted activity

4. The submission is:

The submission is that the rules identified above are to be amended and or deleted as detailed within section 5 below.

5. The submitter seeks the following decision from Greater Wellington Regional Council:

Table of Submitter Requested Changes

Specific Provision	Request	Reason
Rule 36: Agrichemicals – permitted activity	Relief sought Amend the rule. Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.	The inclusion of criteria (e) does not address any known or identified problem. It does not reflect the available information and data on the water quality of Wairarapa potable water supplies (Ministry of Health, 2013-2014). There is no region specific evidence of a risk to community drinking water supply from the activity described by rule 36. The other criteria under the PNRP rule 36 aside from (e), being criteria (g) through to (o) can equally provide for the safe application of agrichemical in a manner that avoids adverse effects upon land within a community drinking water supply area.
Rule R83: Discharge of collected animal effluent onto or into land – controlled activity	Relief sought Amend the rule by deleting condition (e)(iii).	Rule R83 is supported in principle as a sensible approach to managing the effects of dairy farm effluent. However, the submitter is concerned that the identification of the community drinking water supply protection area as shown on map 26 and 27a is faulty and therefore landowners are required by condition (e)(iii) to go through a resource consent process even if the activity is outside the protection area.

Specific Provision	Request	Reason
Rule R89: Farm refuse dumps – permitted activity	Relief sought Amend the rule by deleting condition (d)(iii).	The submitter seeks that rule 89 is amended to remove criterion (d)(iii). The PNRP Section 32 on Discharges to Land report does not have evidence at a regional level that this activity is creating a problem for the Groundwater community drinking water supply protection areas. Policy 69 is basing the implementation of Rule 89 on a precautionary approach but has not quantified the costs of doing so. There is also considerable uncertainty regarding the delineation of the groundwater capture zones based on work undertaken by GNS (Toews and Donarth 2015).
Rule R90: Manufacture and storage of silage and compost – permitted activity	Relief sought Amend condition (d) of the rule by inserting the word "permanent" in front of 'silage storage area' as follows; (d) the walls and floor of a permanent silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and Or any other equivalent change	Condition (d) requiring that all silage areas are lined is not justified. The submitter considers that lining is appropriate for permanent silage storage pits which are used on an ongoing basis. It is not appropriate for temporary silage storage which may only be in use when there is a sufficient additional material for silage that cannot be accommodated by the existing permanent pit. It is suggested that if required, temporary could be defined as being used only once per 4 years (48months). At that frequency of use any silage leachate emanating from a temporary pit would be broken down by biological and chemical soil/ground processes.
Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity	Relief sought Request that the rule be deleted. Or any other equivalent	Based upon the information collected for GWRC by GNS Science (Toews and Donath, 2015) and the information collected by the Ministry of Health (Ministry of Health

Specific Provision	Request	Reason
	change	2013-2014) it is not clear that the land discharge activity is a problem for the Groundwater supply wells or that or that the Groundwater community drinking water supply protection areas are defined appropriately. If these points are correct the rule is being unfairly applied without due recognition of the costs imposed on those parties who will have to comply with the rule. This is in terms of what level of evidence would be required for a consent application under rule 92 to determine that any effects on community drinking water supply water quality are not more than minor?
Rule R94: Cultivation or tilling of land – permitted activity	Relief sought Amend the rule in relation to condition (a) as follows; (a) cultivation-shall not occur within 5m of a surface water body for those surface water bodies with a wetted channel width of greater than 2m of wetted channel. Add new condition as follows; (xx) cultivation shall not occur within 2m of a surface water body with a wetted channel width of less than 2m. Or any other equivalent change	The intent of the rule is to avoid the contamination of surface water bodies by sediment laden run off occurring as a result of cultivation activity. The use of a 5m setback is just a default provision. The information contained in the PNRP Section 32 report discussing the efficiency and effectiveness for livestock access, break-feeding and cultivation highlights various research (Section 5.3, pages 35-36) on the movement of course or fine contaminant particle flows to water, various setback distances and the influence of vegetation.

Specific Provision	Request	Reason
Rule R95: Break-feeding – permitted activity	Relief sought Amend the rule in relation to condition (a) as follows; (a)-break-feeding shall not occur within 5m of a surface water body for those surface water bodies with a wetted channel width of greater than 2m of wetted channel. Add new condition as follows; (xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m. Or any other equivalent change	The submitter considers it is impractical to apply 5m setback to break feeding around small surface water bodies such as farm drains which may completely enclose a fam paddock.
Rule R121: Maintenance of drains – permitted activity	Relief sought Amend the rule in terms of inserting a new condition; (XX) all tools and mechanical devices used for drain clearing must be inspected and cleaned to remove any pest plants or fragments of pest plants, or pest animals before and after use, to prevent the spread of pests. and amend to the following conditions; (g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket with a curved flat base, and a slatted back—that permits the easy drainage of water and fish back into the drain which reduces the likelihood of pest plant	Supports in principle Rule R121, which permits the removal of vegetation or bed material and associated sediment from any drain or highly modified river or stream, as this is an appropriate status for these activities. Good practice for managing the control of pest plant and animals species is for all machinery to be inspected and if needed, cleaned before machinery or equipment is used in any waterway, including drains. Cleaning should also take place after use and before moving to another location. Machinery should not allow the return of pest plants to a drain, particularly where maintenance activity results in fragments of pest plants being returned to a drain. Such an activity is likely to cause the spread of pest

Specific Provision	Request	Reason
	material being spread through the drain, and (j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted Organism under the Biosecurity Act 1993), and Or any other equivalent	plants, and where the pest plants are Unwanted Organisms (UO's) under the Biosecurity Act 1993, this is a breach of the Act. Similarly any actions that cause the spread of pest animals, including pest fish that are UOs is a breach of the Act.
Rule R122: Removing vegetation – permitted activity	Relief sought Amend the rule in terms of the changes to the following conditions; (h) if mechanically clearing aquatic vegetation from an area of river or lake bed covered with water, the machinery must use a weed bucket with a curved flat base, and a slatted back that permits the easy drainage of water and fish back into the drain and which reduces the likelihood of pest plant material being spread through the river, and (j) floating debris and plant	Same reason as for Rule 121.
	material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted	

Specific Provision	Request	Reason		
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- 6. The submitter wishes $\frac{1}{2}$ does not wish to be heard in support of its submission
- 7. If others make a similar submission the submitter does / does not want to present a joint case at a hearing.

Signature of submitter 969 Date 22 OCTOBER 2015
RAYMOND BRIAN CHAIG

		· .

Proposed Natural Resources Plan:

Submitter:

Blair Percy

Submitter Number:

S429

5429

Submission on the Proposed Natural Resources Plan for the Wellington R

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:

Send to:

regionalplan@gw.govt.nz

Your details:

Full name:

Blair Percy

Company name:

Goodlands Partnership

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36 Masterton Stronvar Road

Address2:

RD 6

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Postcode:

5886

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027 499 0241 06 377 5581

Telephone Home: Telephone Cell:

027 499 0241

Email address:

blair.deanne@xtra.co.nz

Trade competition

Yes

I/we could not gain an advantage in trade competition through this submission

No

I/we could gain an advantage in trade competition through this submission.

If you could gain an advantage please complete one of the following:

I/we are directly affected by an effect of the subject matter of my submission that advers

and does not relate to trade competition or the effects of trade competition.

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Attendance and wish to be heard at hearing(s)

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Date:

21/10/2015



Submission on Greater Wellington Proposed Natural Resources Plan

To: Chief Executive, Greater Wellington Regional Council

1. This is a submission from:

Submitter Details:

Craig Dairy Farm Ltd

This submission is also supported by the following parties;

- Gary James Daysh and Anne Marie Daysh (112 Hururua Rd, Caterton RD 1)
- Lewis Herrich (1513 State Highway 53, Martinborough)
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Submitter Contact:

Ray Craig

Submitter Postal Address:

144 Lincoln Road, Carterton 5713

Address for service:

C/- Opus International Consultants Ltd

PO Box 12 003 Wellington 6144

Attention: Nicholas Cooper

Phone: 04-471-7120

Nicholas.Cooper@opus.co.nz

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Submission

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A. Accuracy of nomenclature and identification of the Groundwater community drinking water supply protection areas — Wairarapa Map 27a.

With regard to the Groundwater community drinking water supply protection areas on Map 27a there are a number of concerns are identified:

- Map 27a is entitled "Groundwater community drinking water supply protection areas –
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 'community drinking water' supply protection areas.
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Identifying that those uses are not permitted within the 'groundwater community drink water supply protection area' unduly penalises those landowners or operators within the protection area without identifying an actual environmental problem or adverse effect to avoided, remedied or mitigated.

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This approach is based upon Policy 69 which states;

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Further in section 5.1 it is referenced that Policy 69 directs the management of 'adverse' effects on human drinking water supplies by

"...conditions have been included on rules for specific discharges to land activities including farm refuse dumps, offal pits...." and,

A default protection zone as an 'alert' or 'filtering' mechanism has been identified. This can be seen in proposed Rules R71-R73 and Rule R89, which include a provision that

restricts otherwise permitted activities to occur within a community drinking water supply protection area as identified in Maps 26-27.

The justification for Policy 69 is in the second to last paragraph of 5.1 where it is stated at the bottom of page 17;

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"The volume of waste ending up in farm dumps in the Wellington Region is not known...",

However in the Section 32 Report it is discussed that using data from a study of farm dump disposal in the Waikato and Bay of Plenty regions suggests that a volume of 65,453 tonnes of rural waste annually (Section 5.3.1, page 24 of Section 32: Discharges to Land) is being disposed of within the region. But there is no quantification by the Section 32 report in terms of environmental problems resulting from farm refuse other than a statement (Section 5.3.1 page 24);

"WRC incident reporting shows that inappropriate contents and location of farm refuse dumps has led to environmental contamination in a number of cases."

This doesn't indicate whether farm refuse dumps are an increasing environment problem or whether the dumps have a problem in relation to groundwater and potable water for a community supply.

This submission questions whether the *community supply protection areas* have been identified adequately to impose restriction upon land users where there is no record established of an adverse effect occurring.

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- The adoption of conservative, and potentially non-validated capture zones. This is acknowledged within the report upon which the extents of the capture zones are based (GNS, 2015).
- The adoption of the default capture zones, with no empirical support or justification, will place the onus on the landowner to show that they are not causing a problem. The available evidence suggests that there is not actually a problem to be addressed.
- There is no economic assessment of the costs of imposing the proposed capture zones on existing and lawful land use activities. There may be potentially substantial direct and indirect costs and restrictions imposed on landowners. The Section 32 Report has not weighed these against any benefits from 'managing' a national issue, rather than quantifying and determining the extent of the potential scale at the issue within Greater Wellington.
- B. Rules of the Proposed Natural Resources Plan being;

With regard to farming activities within the Groundwater Supply Protection Areas this submission comments on the following rules of the PNRP

- Rule 36: Agrichemicals permitted activity
- Rule R83: Discharge of collected animal effluent onto or into land controlled activity
- Rule R89: Farm refuse dumps permitted activity
- Rule R90: Manufacture and storage of silage and compost permitted activity
- Rule 92: All discharges to land within community drinking water supply protection areas restricted discretionary activity
- Rule R94: Cultivation or tilling of land permitted activity
- Rule R95: Break-feeding permitted activity
- Rule R96: Cultivation and break-feeding discretionary activity
- Rule R121: Maintenance of drains permitted activity
- Rule R122: Removing vegetation permitted activity

4. The submission is:

The submission is that the rules identified above are to be amended and or deleted as detailed within section 5 below.

5. The submitter seeks the following decision from Greater Wellington Regional Council:

Table of Submitter Requested Changes

Specific Provision	Request	Reason
Rule 36: Agrichemicals – permitted activity	Relief sought Amend the rule. Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.	The inclusion of criteria (e) does not address any known or identified problem. It does not reflect the available information and data on the water quality of Wairarapa potable water supplies (Ministry of Health, 2013-2014). There is no region specific evidence of a risk to community drinking water supply from the activity described by rule 36. The other criteria under the PNRP rule 36 aside from (e), being criteria (g) through to (o) can equally provide for the safe application of agrichemical in a manner that avoids adverse effects upon land within a community drinking water supply area.
Rule R83: Discharge of collected animal effluent onto or into land — controlled activity	Relief sought Amend the rule by deleting condition (e)(iii).	Rule R83 is supported in principle as a sensible approach to managing the effects of dairy farm effluent. However, the submitter is concerned that the identification of the community drinking water supply protection area as shown on map 26 and 27a is faulty and therefore landowners are required by condition (e)(iii) to go through a resource consent process even if the activity is outside the protection area.

Specific Provision	Request	Reason
Rule R89: Farm refuse dumps – permitted activity	Relief sought Amend the rule by deleting condition (d)(iii).	The submitter seeks that rule 89 is amended to remove criterion (d)(iii). The PNRP Section 32 on Discharges to Land report does not have evidence at a regional level that this activity is creating a problem for the Groundwater community drinking water supply protection areas. Policy 69 is basing the implementation of Rule 89 on a precautionary approach but has not quantified the costs of doing so. There is also considerable uncertainty regarding the delineation of the groundwater capture zones based on work undertaken by GNS (Toews and Donarth 2015).
Rule R90: Manufacture and storage of silage and compost – permitted activity	Relief sought Amend condition (d) of the rule by inserting the word "permanent" in front of 'silage storage area' as follows; (d) the walls and floor of a permanent silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and Or any other equivalent change	Condition (d) requiring that all silage areas are lined is not justified. The submitter considers that lining is appropriate for permanent silage storage pits which are used on an ongoing basis. It is not appropriate for temporary silage storage which may only be in use when there is a sufficient additional material for silage that cannot be accommodated by the existing permanent pit. It is suggested that if required, temporary could be defined as being used only once per 4 years (48months). At that frequency of use any silage leachate emanating from a temporary pit would be broken down by biological and chemical soil/ground processes.
Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity	Relief sought Request that the rule be deleted. Or any other equivalent	Based upon the information collected for GWRC by GNS Science (Toews and Donath, 2015) and the information collected by the Ministry of Health (Ministry of Health

Specific Provision	Request	Reason
	change	2013-2014) it is not clear that the land discharge activity is a problem for the Groundwater supply wells or that or that the Groundwater community drinking water supply protection areas are defined appropriately. If these points are correct the rule is being unfairly applied without due recognition of the costs imposed on those parties who will have to comply with the rule. This is in terms of what level of evidence would be required for a consent application under rule 92 to determine that any effects on community drinking water supply water quality are not more than minor?
Rule R94: Cultivation or tilling of land – permitted activity	Relief sought Amend the rule in relation to condition (a) as follows; (a) cultivation-shall not occur within 5m of a surface water body for those surface water bodies with a wetted channel width of greater than 2m of wetted channel, Add new condition as follows; (xx) cultivation shall not occur within 2m of a surface water body with a wetted channel width of less than 2m, Or any other equivalent change	The intent of the rule is to avoid the contamination of surface water bodies by sediment laden run off occurring as a result of cultivation activity. The use of a 5m setback is just a default provision. The information contained in the PNRP Section 32 report discussing the efficiency and effectiveness for livestock access, break-feeding and cultivation highlights various research (Section 5.3, pages 35-36) on the movement of course or fine contaminant particle flows to water, various setback distances and the influence of vegetation.

Specific Provision	Request	Reason
Rule R95: Break-feeding – permitted activity	Relief sought Amend the rule in relation to condition (a) as follows; (a)-break-feeding shall not occur within 5m of a surface water body for those surface water bodies with a wetted channel width of greater than 2m of wetted channel. Add new condition as follows; (xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m. Or any other equivalent change	The submitter considers it is impractical to apply 5m setback to break feeding around small surface water bodies such as farm drains which may completely enclose a fam paddock.
Rule R121: Maintenance of drains – permitted activity	Relief sought Amend the rule in terms of inserting a new condition; (XX) all tools and mechanical devices used for drain clearing must be inspected and cleaned to remove any pest plants or fragments of pest plants, or pest animals before and after use, to prevent the spread of pests. and amend to the following conditions; (g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket with a curved flat base, and a slatted back that permits the easy drainage of water and fish back into the drain which reduces the likelihood of pest plant	Supports in principle Rule R121, which permits the removal of vegetation or bed material and associated sediment from any drain or highly modified river or stream, as this is an appropriate status for these activities. Good practice for managing the control of pest plant and animals species is for all machinery to be inspected and if needed, cleaned before machinery or equipment is used in any waterway, including drains. Cleaning should also take place after use and before moving to another location. Machinery should not allow the return of pest plants to a drain, particularly where maintenance activity results in fragments of pest plants being returned to a drain. Such an activity is likely to cause the spread of pest

Specific Provision	Request	Reason
	material being spread through the drain, and (j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted Organism under the Biosecurity Act 1993), and Or any other equivalent	plants, and where the pest plants are Unwanted Organisms (UO's) under the Biosecurity Act 1993, this is a breach of the Act. Similarly any actions that cause the spread of pest animals, including pest fish that are UOs is a breach of the Act.
Rule R122: Removing vegetation – permitted	change Relief sought	Same reason as for Rule 121.
activity	Amend the rule in terms of the changes to the following conditions;	
	(h) if mechanically clearing aquatic vegetation from an area of river or lake bed covered with water, the machinery must use a weed bucket with a curved flat base rand a slatted back that permits the easy drainage of water and fish back into the drain and which reduces the likelihood of pest plant material being spread through the river, and	
	(j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted	

Specific Provision	Request	Reason
A COTA	Organism under the Biosecurity Act 1993), and	
	Or any other equivalent change	

- 6. The submitter wishes + does not wish to be heard in support of its submission
- 7. If others make a similar submission the submitter does / does not want to present a joint case at a hearing.

Signature of submitter GLAGO Date 22 OCTOBER 2015
ARYMAND BRIAN CHAIG



Proposed Natural Resources Plan:

Submitter:

Ali & Dion Kilmister

Submitter Number:

S430



5430

Submission on the Proposed Natural Resources Plan for the Wellington R

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:

Send to:

regionalplan@gw.govt.nz

Your details:

Full name:

Ali & Dion Kilmister

Company name:

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Telephone Work:

027 609 9522

Telephone Home:

Telephone Cell:

027 609 9522

Email address:

toviewadream@wizbiz.net.nz

Trade competition

I/we could not gain an advantage in trade competition through this submission

I/we could gain an advantage in trade competition through this submission.

If you could gain an advantage please complete one of the following:

I/we are directly affected by an effect of the subject matter of my submission that adversand does not relate to trade competition or the effects of trade competition.

I/we are not directly affected by an effect of the subject matter of my submission that advand does not relate to trade competition or the effects of trade competition.

Attendance and wish to be heard at hearing(s)

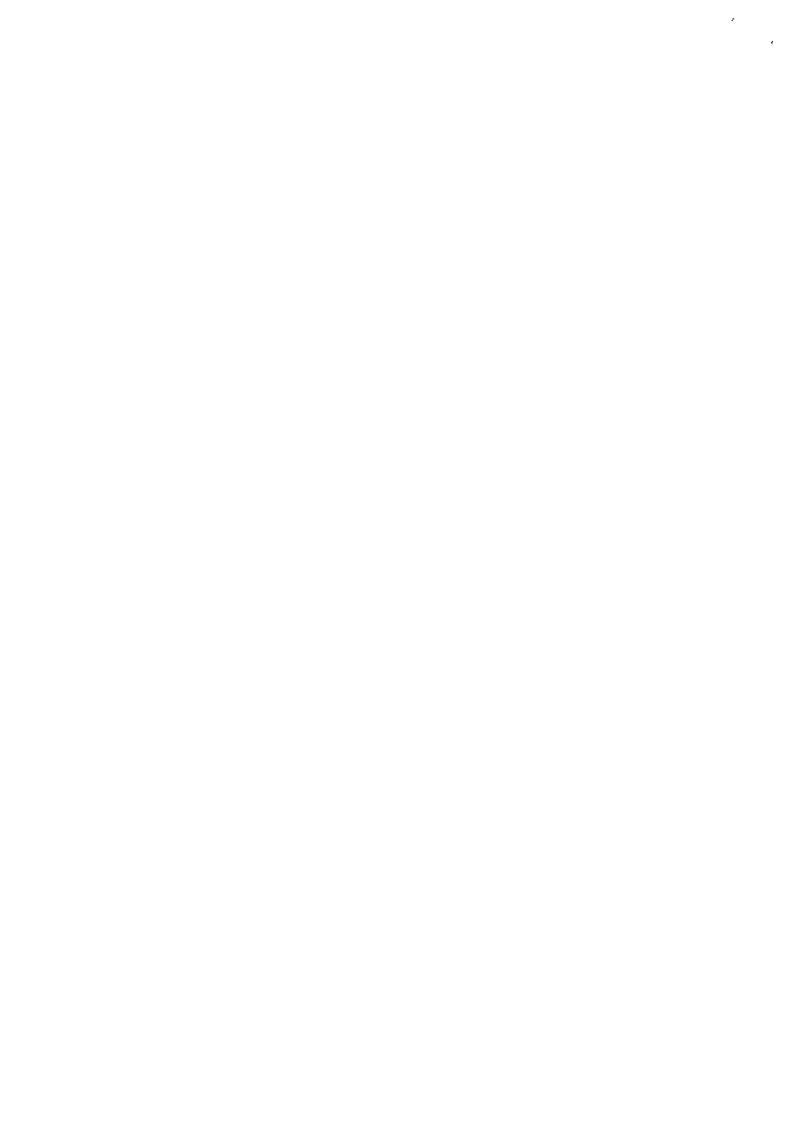
I/we do wish to be heard in support of my/your submission

[Note: this means that you wish to speak in support of your submission at the hearing(s).] I/we do not wish to be heard in support of my/our submission

[Note: this means that you cannot speak at the hearing. However, you will still retain your any decision made by the Wellington Regional Council to the Environment Court.]

If other make a similar submission, I will consider presenting a joint case with them at a hi

Date:



Submission on Greater Wellington Proposed Natural Resources Plan

To: Chief Executive, Greater Wellington Regional Council

1. This is a submission from:

Submitter Details:

Craig Dairy Farm Ltd

This submission is also supported by the following parties;

- Gary James Daysh and Anne Marie Daysh (112 Hururua Rd, Caterton RD 1)
- Lewis Herrich (1513 State Highway 53, Martinborough)
- Blair Percy (36 Masterton Stronvar Road, Masterton)
- Sandra Joy Shivas (28 Mangatarere Rd, Carterton RD 1)
- James and Jane Smallwood (19 Homestead Lane, Greytown)
- N & S Terry (Richmond Road, Carterton)
- Ali Scott & Dion Kilmister (1665 Te Ore Ore Bideford Road, Masterton RD11)
- AB & DE Smith (60 Chester Road, Carterton)
- Beryl Masters Stuart (107 Manuka Street, Masterton 5810)
- Garry Daniell (Te Ore Ore Road)

A contact address sheet is provided for each of these parties as attached to the submission.

Submitter Contact:

Ray Craig

Submitter Postal Address:

144 Lincoln Road, Carterton 5713

Address for service:

C/- Opus International Consultants Ltd

PO Box 12 003 Wellington 6144

Attention: Nicholas Cooper

Phone: 04-471-7120

Nicholas.Cooper@opus.co.nz

Trade Competition

I/we **could not** gain an advantage in trade competition through this submission [If you ticked this box, delete the rest of this section and go straight to 'Your submission']

Submission

- 2. This is a submission on the Proposed Natural Resource Plan for the Greater Wellington Regional Council
- 3. The specific provisions of the proposal that this submission relates to are:

The specific provisions of the proposed NRP that the submission relates to are in terms of:

A. Accuracy of nomenclature and identification of the Groundwater community drinking water supply protection areas — Wairarapa Map 27a.

With regard to the Groundwater community drinking water supply protection areas on Map 27a there are a number of concerns are identified:

- Map 27a is entitled "Groundwater community drinking water supply protection areas Wairarapa (incorporates Schedule M2). Within Map 27a there are identified 'Groundwater supply well', and 'Groundwater supply protection area'. Map 27a does not identify 'community drinking water' supply protection areas.
- The proposed defaulting of activities (currently permitted) such as the application of agrichemical (rule 36), the discharge of collected animal effluent (rule 83), or farm refuse dumps (rule 89) to discretionary or restricted discretionary activities where on land within an identified community drinking water supply protection area creates an uncertainty for the current landowner or operator in regard to future land use and management options.
 - Identifying that those uses are not permitted within the 'groundwater community drink water supply protection area' unduly penalises those landowners or operators within the protection area without identifying an actual environmental problem or adverse effect to avoided, remedied or mitigated.
- The Proposed NRP Section 32 Report for Discharges to Land in Section 5 "Efficiency and Effectiveness" discusses managing effects on drinking water supplies (5.1), rural waste (5.3), manufacture and storage of silage and compost (5.4), and collected animal effluent (5.5). The only specific data about groundwater for the Wairarapa cited is the region wide study relating to groundwater capture zones by GNS Science (Toews and Donath, 2015). Section 5.1 on page 17 states

Taking a precautionary approach (in accordance with Policy P3 of the proposed Plan) in protecting sources of community drinking water is generally more effective and less costly than trying to counteract the impacts of contamination after the occurrence. Uncertainty about how well the mapped zones reflect actual contaminant pathways and channel characteristics (and therefore risk), will always be present, and especially so in the vicinity of minor tributaries. However, the extent of the protection zones should be reviewed and refined over time as knowledge and methodologies improve. An external peer review has confirmed that the approach to identifying zones around the drinking water supplies as protections areas, was appropriate and defensible (Potts 2015).

This approach is based upon Policy 69 which states;

Policy P69: Human drinking water supplies
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 practicable. Where adverse effects cannot be avoided, the adverse effects shall
be managed having particular regard to:

Further in section 5.1 it is referenced that Policy 69 directs the management of 'adverse' effects on human drinking water supplies by

"...conditions have been included on rules for specific discharges to land activities including farm refuse dumps, offal pits...." and,

A default protection zone as an 'alert' or 'filtering' mechanism has been identified. This can be seen in proposed Rules R71-R73 and Rule R89, which include a provision that

restricts otherwise permitted activities to occur within a community drinking water supply protection area as identified in Maps 26-27.

The justification for Policy 69 is in the second to last paragraph of 5.1 where it is stated at the bottom of page 17;

Proposed Policy P69 is followed by a note explaining that sections 7 and 8 of the NES-Drinking Water limit the ability of a regional council to grant consent to activities within community supply protection areas.

There are no specific problems regarding water quality, and a link between land use and water quality, has been identified in the area affected by Schedule M2.

Under the discussion relating to rural waste (Section 5.2.2 of the PNRP Section 32 report: Discharges to land) pages 22 it is stated;

Agriculture plays a role in the economic and social well-being in the Wellington Region, primarily in the Wairarapa but also in the rest of the region. Farming practices produce a variety of waste streams from construction waste (timber and metal) and hazardous wastes (agrichemicals and paints), to household organic food scrap waste and dead animals. It is important to ensure that waste management options are available to enable rural landowners not only to minimise their waste, but also to divert or dispose of it in a sustainable manner.

In terms of farm rural waste and assessing whether there are adverse environmental effects occurring within the Wairapapa, or the community supply protection areas specifically,

"The volume of waste ending up in farm dumps in the Wellington Region is not known...",

However in the Section 32 Report it is discussed that using data from a study of farm dump disposal in the Waikato and Bay of Plenty regions suggests that a volume of 65,453 tonnes of rural waste annually (Section 5.3.1, page 24 of Section 32: Discharges to Land) is being disposed of within the region. But there is no quantification by the Section 32 report in terms of environmental problems resulting from farm refuse other than a statement (Section 5.3.1 page 24);

"WRC incident reporting shows that inappropriate contents and location of farm refuse dumps has led to environmental contamination in a number of cases."

This doesn't indicate whether farm refuse dumps are an increasing environment problem or whether the dumps have a problem in relation to groundwater and potable water for a community supply.

This submission questions whether the *community supply protection areas* have been identified adequately to impose restriction upon land users where there is no record established of an adverse effect occurring.

- A report on water quality, the Ministry of Health Annual Report on Drinking Water Quality (2013-2014) indicate that there is no problem which requires management.
- The use of a regional-scale model, with inherent assumptions and generalisations, to predict the behaviour at specific bores and locations. While the availability of hydrogeological data may be appropriate to support a regional-scale model, considerable local variation exists. As stated in GNS (2015) "The models were never calibrated as groundwater transport models" and "Because the groundwater models were not calibrated as transport models, the travel times of particle path lines may not be accurate; however, their flow pathways should remain the same." Consequently, at specific locations there will be significant differences

between the assumed/modelled conditions and the actual situation. Any default classification, such as schedule M2, therefore must not be overly restrictive.

- There is a lack of empirical calibration or validation of the model. The available data suggests that the model is either inappropriate or that there is no problem to be addressed. In addition: "The mapped zones in this report (GNS, 2015) are conservative in the sense that their size and shape consider a wide range of uncertainties. The boundaries do not mark absolute boundaries of the CZs and PZs, and as such, may delineate zones that may not contribute groundwater to wells. Some of the uncertainty analysis runs, for instance, may not realistically portray groundwater flow, and as a result would map a zone larger than it should be."
- The adoption of conservative, and potentially non-validated capture zones. This is acknowledged within the report upon which the extents of the capture zones are based (GNS, 2015).
- The adoption of the default capture zones, with no empirical support or justification, will place the onus on the landowner to show that they are not causing a problem. The available evidence suggests that there is not actually a problem to be addressed.
- There is no economic assessment of the costs of imposing the proposed capture zones on existing and lawful land use activities. There may be potentially substantial direct and indirect costs and restrictions imposed on landowners. The Section 32 Report has not weighed these against any benefits from 'managing' a national issue, rather than quantifying and determining the extent of the potential scale at the issue within Greater Wellington.
- B. Rules of the Proposed Natural Resources Plan being;

With regard to farming activities within the Groundwater Supply Protection Areas this submission comments on the following rules of the PNRP

- Rule 36: Agrichemicals permitted activity
- Rule R83: Discharge of collected animal effluent onto or into land controlled activity
- Rule R89: Farm refuse dumps permitted activity
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- Rule 92: All discharges to land within community drinking water supply protection areas restricted discretionary activity
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- Rule R121: Maintenance of drains permitted activity
- Rule R122: Removing vegetation permitted activity

4. The submission is:

The submission is that the rules identified above are to be amended and or deleted as detailed within section 5 below.

5. The submitter seeks the following decision from Greater Wellington Regional Council:

Table of Submitter Requested Changes

Specific Provision	Request	Reason
Rule 36: Agrichemicals – permitted activity	Relief sought Amend the rule. Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.	The inclusion of criteria (e) does not address any known or identified problem. It does not reflect the available information and data on the water quality of Wairarapa potable water supplies (Ministry of Health, 2013-2014). There is no region specific evidence of a risk to community drinking water supply from the activity described by rule 36. The other criteria under the PNRP rule 36 aside from (e), being criteria (g) through to (o) can equally provide for the safe application of agrichemical in a manner that avoids adverse effects upon land within a community drinking water supply area.
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Specific Provision	Request	Reason
Rule R89: Farm refuse dumps – permitted activity	Relief sought Amend the rule by deleting condition (d)(iii).	The submitter seeks that rule 89 is amended to remove criterion (d)(iii). The PNRP Section 32 on Discharges to Land report does not have evidence at a regional level that this activity is creating a problem for the Groundwater community drinking water supply protection areas. Policy 69 is basing the implementation of Rule 89 on a precautionary approach but has not quantified the costs of doing so. There is also considerable uncertainty regarding the delineation of the groundwater capture zones based on work undertaken by GNS (Toews and Donarth 2015).
Rule R90: Manufacture and storage of silage and compost – permitted activity	Relief sought Amend condition (d) of the rule by inserting the word "permanent" in front of 'silage storage area' as follows; (d) the walls and floor of a permanent silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and Or any other equivalent change	Condition (d) requiring that all silage areas are lined is not justified. The submitter considers that lining is appropriate for permanent silage storage pits which are used on an ongoing basis. It is not appropriate for temporary silage storage which may only be in use when there is a sufficient additional material for silage that cannot be accommodated by the existing permanent pit. It is suggested that if required, temporary could be defined as being used only once per 4 years (48months). At that frequency of use any silage leachate emanating from a temporary pit would be broken down by biological and chemical soil/ground processes.
Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity	Relief sought Request that the rule be deleted. Or any other equivalent	Based upon the information collected for GWRC by GNS Science (Toews and Donath, 2015) and the information collected by the Ministry of Health (Ministry of Health

Specific Provision	Request	Reason
	change	2013-2014) it is not clear that the land discharge activity is a problem for the Groundwater supply wells or that or that the Groundwater community drinking water supply protection areas are defined appropriately. If these points are correct the rule is being unfairly applied without due recognition of the costs imposed on those parties who will have to comply with the rule. This is in terms of what level of evidence would be required for a consent application under rule 92 to determine that any effects on community drinking water supply water quality are not more than minor?
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Specific Provision	Request	Reason
Rule R95: Break-feeding – permitted activity	Relief sought Amend the rule in relation to condition (a) as follows; (a)-break-feeding shall not occur within 5m of a surface water body for those surface water bodies with a wetted channel width of greater than 2m of wetted channel, Add new condition as follows; (xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m. Or any other equivalent change	The submitter considers it is impractical to apply 5m setback to break feeding around small surface water bodies such as farm drains which may completely enclose a fam paddock.
Rule R121: Maintenance of drains – permitted activity	Relief sought Amend the rule in terms of inserting a new condition; (XX) all tools and mechanical devices used for drain clearing must be inspected and cleaned to remove any pest plants or fragments of pest plants, or pest animals before and after use, to prevent the spread of pests. and amend to the following conditions; (g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket with a curved flat base, and a slatted back that permits the easy drainage of water and fish back into the drain which reduces the likelihood of pest plant	Supports in principle Rule R121, which permits the removal of vegetation or bed material and associated sediment from any drain or highly modified river or stream, as this is an appropriate status for these activities. Good practice for managing the control of pest plant and animals species is for all machinery to be inspected and it needed, cleaned before machinery or equipment is used in any waterway, including drains. Cleaning should also take place after use and before moving to another location. Machinery should not allow the return of pest plants to a drain particularly where maintenance activity results in fragments or pest plants being returned to a drain. Such an activity is likely to cause the spread of pes

Specific Provision	Request	Reason
	material being spread through the drain, and (j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted Organism under the Biosecurity Act 1993), and Or any other equivalent	plants, and where the pest plants are Unwanted Organisms (UO's) under the Biosecurity Act 1993, this is a breach of the Act. Similarly any actions that cause the spread of pest animals, including pest fish that are UOs is a breach of the Act.
D 1 D D	change	
Rule R122: Removing vegetation – permitted activity	Relief sought Amend the rule in terms of the changes to the following conditions; (h) if mechanically clearing aquatic vegetation from an area of river or lake bed covered with water, the machinery must use a weed bucket with a curved flat base, and a slatted back that permits the easy drainage of water and fish back into the drain and which reduces the likelihood of pest plant material being spread through the river, and (j) floating debris and plant	Same reason as for Rule 121.
	material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted	

Specific Provision	Request	Reason
Salve (Material Community of the Communi	Organism under the Biosecurity Act 1993), and	
	Or any other equivalent change	

- 6. The submitter wishes / does not wish to be heard in support of its submission
- 7. If others make a similar submission the submitter does / does not want to present a joint case at a hearing.

MAYMOND BRIAN CHAIG



Proposed Natural Resources Plan:

Submitter:

Garry Daniell

Submitter Number:

S431



Submission on the Proposed Natural Resources Plan for the Wellington R

INSTRUCTIONS FOR U	SING THE SUBMISSIONS SPREADSHEET:	
Send to:	regionalplan@gw.govt.nz	INSTRUCTIONS
Your details:		
Full name:	Garry Daniell	
Company name:		
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Address2:		
Address3:		
Address4: Town		
Postcode:		
Telephone Work:		
Telephone Home:		ŧ.
Telephone Cell:		
Email address:	gdaniell125@gmail.com	
Trade competition I/we coul	d not gain an advantage in trade competitio	n through this submission
l/we coul	d gain an advantage in trade competition th	rough this submission
If you could gain an ad	vantage please complete one of the following	ng:
	directly affected by an effect of the subject n	
and does	not relate to trade competition or the effect	ts of trade competition.
l/we are i	not directly affected by an effect of the subje	ect matter of my submission that ad
and does	not relate to trade competition or the effect	is of trade competition.
Attendance and wish	to be heard at hearing(s)	
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l/we do n	ot wish to be heard in support of my/our sul	bmission
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'If other m	ake a similar submission, I will consider pres	senting a joint case with them at a ho

Date:



Submission on Greater Wellington Proposed Natural Resources Plan

To: Chief Executive, Greater Wellington Regional Council

1. This is a submission from:

Submitter Details:

Craig Dairy Farm Ltd

This submission is also supported by the following parties;

- Gary James Daysh and Anne Marie Daysh (112 Hururua Rd, Caterton RD 1)
- Lewis Herrich (1513 State Highway 53, Martinborough)
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A contact address sheet is provided for each of these parties as attached to the submission.

Submitter Contact:

Ray Craig

Submitter Postal Address:

144 Lincoln Road, Carterton 5713

Address for service:

C/- Opus International Consultants Ltd

PO Box 12 003 Wellington 6144

Attention: Nicholas Cooper

Phone: 04-471-7120

Nicholas.Cooper@opus.co.nz

Trade Competition

I/we **could not** gain an advantage in trade competition through this submission [If you ticked this box, delete the rest of this section and go straight to 'Your submission']

Submission

- 2. This is a submission on the Proposed Natural Resource Plan for the Greater Wellington Regional Council
- 3. The specific provisions of the proposal that this submission relates to are:

The specific provisions of the proposed NRP that the submission relates to are in terms of;

A. Accuracy of nomenclature and identification of the Groundwater community drinking water supply protection areas — Wairarapa Map 27a.

With regard to the Groundwater community drinking water supply protection areas on Map 27a there are a number of concerns are identified:

- Map 27a is entitled "Groundwater community drinking water supply protection areas –
 Wairarapa (incorporates Schedule M2). Within Map 27a there are identified 'Groundwater
 supply well', and 'Groundwater supply protection area'. Map 27a does not identify
 'community drinking water' supply protection areas.
- The proposed defaulting of activities (currently permitted) such as the application of agrichemical (rule 36), the discharge of collected animal effluent (rule 83), or farm refuse dumps (rule 89) to discretionary or restricted discretionary activities where on land within an identified community drinking water supply protection area creates an uncertainty for the current landowner or operator in regard to future land use and management options.

Identifying that those uses are not permitted within the 'groundwater community drink water supply protection area' unduly penalises those landowners or operators within the protection area without identifying an actual environmental problem or adverse effect to avoided, remedied or mitigated.

• The Proposed NRP Section 32 Report for Discharges to Land in Section 5 "Efficiency and Effectiveness" discusses managing effects on drinking water supplies (5.1), rural waste (5.3), manufacture and storage of silage and compost (5.4), and collected animal effluent (5.5). The only specific data about groundwater for the Wairarapa cited is the region wide study relating to groundwater capture zones by GNS Science (Toews and Donath, 2015). Section 5.1 on page 17 states

Taking a precautionary approach (in accordance with Policy P3 of the proposed Plan) in protecting sources of community drinking water is generally more effective and less costly than trying to counteract the impacts of contamination after the occurrence. Uncertainty about how well the mapped zones reflect actual contaminant pathways and channel characteristics (and therefore risk), will always be present, and especially so in the vicinity of minor tributaries. However, the extent of the protection zones should be reviewed and refined over time as knowledge and methodologies improve. An external peer review has confirmed that the approach to identifying zones around the drinking water supplies as protections areas, was appropriate and defensible (Potts 2015).

This approach is based upon Policy 69 which states;

Policy P69: Human drinking water supplies
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 practicable. Where adverse effects cannot be avoided, the adverse effects shall
be managed having particular regard to:

Further in section 5.1 it is referenced that Policy 69 directs the management of 'adverse' effects on human drinking water supplies by

"...conditions have been included on rules for specific discharges to land activities including farm refuse dumps, offal pits...." and,

A default protection zone as an 'alert' or 'filtering' mechanism has been identified. This can be seen in proposed Rules R71-R73 and Rule R89, which include a provision that

restricts otherwise permitted activities to occur within a community drinking water supply protection area as identified in Maps 26-27.

The justification for Policy 69 is in the second to last paragraph of 5.1 where it is stated at the bottom of page 17;

Proposed Policy P69 is followed by a note explaining that sections 7 and 8 of the NES-Drinking Water limit the ability of a regional council to grant consent to activities within community supply protection areas.

There are no specific problems regarding water quality, and a link between land use and water quality, has been identified in the area affected by Schedule M2.

Under the discussion relating to rural waste (Section 5.2.2 of the PNRP Section 32 report: Discharges to land) pages 22 it is stated;

Agriculture plays a role in the economic and social well-being in the Wellington Region, primarily in the Wairarapa but also in the rest of the region. Farming practices produce a variety of waste streams from construction waste (timber and metal) and hazardous wastes (agrichemicals and paints), to household organic food scrap waste and dead animals. It is important to ensure that waste management options are available to enable rural landowners not only to minimise their waste, but also to divert or dispose of it in a sustainable manner.

In terms of farm rural waste and assessing whether there are adverse environmental effects occurring within the Wairapapa, or the community supply protection areas specifically,

"The volume of waste ending up in farm dumps in the Wellington Region is not known...",

However in the Section 32 Report it is discussed that using data from a study of farm dump disposal in the Waikato and Bay of Plenty regions suggests that a volume of 65,453 tonnes of rural waste annually (Section 5.3.1, page 24 of Section 32: Discharges to Land) is being disposed of within the region. But there is no quantification by the Section 32 report in terms of environmental problems resulting from farm refuse other than a statement (Section 5.3.1 page 24);

"WRC incident reporting shows that inappropriate contents and location of farm refuse dumps has led to environmental contamination in a number of cases."

This doesn't indicate whether farm refuse dumps are an increasing environment problem or whether the dumps have a problem in relation to groundwater and potable water for a community supply.

This submission questions whether the *community supply protection areas* have been identified adequately to impose restriction upon land users where there is no record established of an adverse effect occurring.

- A report on water quality, the Ministry of Health *Annual Report on Drinking Water Quality* (2013-2014) indicate that there is no problem which requires management.
- The use of a regional-scale model, with inherent assumptions and generalisations, to predict the behaviour at specific bores and locations. While the availability of hydrogeological data may be appropriate to support a regional-scale model, considerable local variation exists. As stated in GNS (2015) "The models were never calibrated as groundwater transport models" and "Because the groundwater models were not calibrated as transport models, the travel times of particle path lines may not be accurate; however, their flow pathways should remain the same." Consequently, at specific locations there will be significant differences

between the assumed/modelled conditions and the actual situation. Any default classification, such as schedule M2, therefore must not be overly restrictive.

- There is a lack of empirical calibration or validation of the model. The available data suggests that the model is either inappropriate or that there is no problem to be addressed. In addition: "The mapped zones in this report (GNS, 2015) are conservative in the sense that their size and shape consider a wide range of uncertainties. The boundaries do not mark absolute boundaries of the CZs and PZs, and as such, may delineate zones that may not contribute groundwater to wells. Some of the uncertainty analysis runs, for instance, may not realistically portray groundwater flow, and as a result would map a zone larger than it should be."
- The adoption of conservative, and potentially non-validated capture zones. This is acknowledged within the report upon which the extents of the capture zones are based (GNS, 2015).
- The adoption of the default capture zones, with no empirical support or justification, will place the onus on the landowner to show that they are not causing a problem. The available evidence suggests that there is not actually a problem to be addressed.
- There is no economic assessment of the costs of imposing the proposed capture zones on existing and lawful land use activities. There may be potentially substantial direct and indirect costs and restrictions imposed on landowners. The Section 32 Report has not weighed these against any benefits from 'managing' a national issue, rather than quantifying and determining the extent of the potential scale at the issue within Greater Wellington.
- B. Rules of the Proposed Natural Resources Plan being;

With regard to farming activities within the Groundwater Supply Protection Areas this submission comments on the following rules of the PNRP

- Rule 36: Agrichemicals permitted activity
- Rule R83: Discharge of collected animal effluent onto or into land controlled activity
- Rule R89: Farm refuse dumps permitted activity
- Rule R90: Manufacture and storage of silage and compost permitted activity
- Rule 92: All discharges to land within community drinking water supply protection areas restricted discretionary activity
- Rule R94: Cultivation or tilling of land permitted activity
- Rule R95: Break-feeding permitted activity
- Rule R96: Cultivation and break-feeding discretionary activity
- Rule R121: Maintenance of drains permitted activity
- Rule R122: Removing vegetation permitted activity

4. The submission is:

The submission is that the rules identified above are to be amended and or deleted as detailed within section 5 below.

5. The submitter seeks the following decision from Greater Wellington Regional Council:

Table of Submitter Requested Changes

Specific Provision	Request	Reason
Rule 36: Agrichemicals – permitted activity	Relief sought Amend the rule. Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.	The inclusion of criteria (e) does not address any known or identified problem. It does not reflect the available information and data on the water quality of Wairarapa potable water supplies (Ministry of Health, 2013-2014). There is no region specific evidence of a risk to community drinking water supply from the activity described by rule 36. The other criteria under the PNRP rule 36 aside from (e), being criteria (g) through to (o) can equally provide for the safe application of agrichemical in a manner that avoids adverse effects upon land within a community drinking water supply area.
Rule R83: Discharge of collected animal effluent onto or into land – controlled activity	Relief sought Amend the rule by deleting condition (e)(iii).	Rule R83 is supported in principle as a sensible approach to managing the effects of dairy farm effluent. However, the submitter is concerned that the identification of the community drinking water supply protection area as shown on map 26 and 27a is faulty and therefore landowners are required by condition (e)(iii) to go through a resource consent process even if the activity is outside the protection area.

Specific Provision	Request	Reason
Rule R89: Farm refuse dumps – permitted activity	Relief sought Amend the rule by deleting condition (d)(iii).	The submitter seeks that rule 89 is amended to remove criterion (d)(iii). The PNRP Section 32 on Discharges to Land report does not have evidence at a regional level that this activity is creating a problem for the Groundwater community drinking water supply protection areas. Policy 69 is basing the implementation of Rule 89 on a precautionary approach but has not quantified the costs of doing so. There is also considerable uncertainty regarding the delineation of the groundwater capture zones based on work undertaken by GNS (Toews and Donarth 2015).
Rule R90: Manufacture and storage of silage and compost – permitted activity	Relief sought Amend condition (d) of the rule by inserting the word "permanent" in front of 'silage storage area' as follows; (d) the walls and floor of a permanent silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and Or any other equivalent change	Condition (d) requiring that all silage areas are lined is not justified. The submitter considers that lining is appropriate for permanent silage storage pits which are used on an ongoing basis. It is not appropriate for temporary silage storage which may only be in use when there is a sufficient additional material for silage that cannot be accommodated by the existing permanent pit. It is suggested that if required, temporary could be defined as being used only once per 4 years (48months). At that frequency of use any silage leachate emanating from a temporary pit would be broken down by biological and chemical soil/ground processes.
Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity	Relief sought Request that the rule be deleted. Or any other equivalent	Based upon the information collected for GWRC by GNS Science (Toews and Donath, 2015) and the information collected by the Ministry of Health (Ministry of Health

Specific Provision	Request	Reason
	change	the land discharge activity is a problem for the Groundwater supply wells or that or that the Groundwater community drinking water supply protection areas are defined appropriately. If these points are correct the rule is being unfairly applied without due recognition of the costs imposed on those parties who will have to comply with the rule. This is in terms of what level of evidence would be required for a consent application under rule 92 to determine that any effects on community drinking water supply water quality are not more than minor?
Rule R94: Cultivation or tilling of land – permitted activity	Relief sought Amend the rule in relation to condition (a) as follows; (a) cultivation-shall not occur within 5m of a surface water body for those surface water bodies with a wetted channel width of greater than 2m of wetted channel, Add new condition as follows; (xx) cultivation shall not occur within 2m of a surface water body with a wetted channel width of less than 2m, Or any other equivalent change	The intent of the rule is to avoid the contamination of surface water bodies by sediment laden run off occurring as a result of cultivation activity. The use of a 5m setback is just a default provision. The information contained in the PNRP Section 32 report discussing the efficiency and effectiveness for livestock access, break-feeding and cultivation highlights various research (Section 5.3, pages 35-36) on the movement of course or fine contaminant particle flows to water, various setback distances and the influence of vegetation.

Specific Provision	Request	Reason
Rule R95: Break-feeding – permitted activity	Relief sought Amend the rule in relation to condition (a) as follows; (a)-break-feeding shall not occur within 5m of a surface water body for those surface water bodies with a wetted channel width of greater than 2m of wetted channel, Add new condition as follows; (xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m. Or any other equivalent change	The submitter considers it is impractical to apply 5m setback to break feeding around small surface water bodies such as farm drains which may completely enclose a fam paddock.
Rule R121: Maintenance of drains – permitted activity	Relief sought Amend the rule in terms of inserting a new condition; (XX) all tools and mechanical devices used for drain clearing must be inspected and cleaned to remove any pest plants or fragments of pest plants, or pest animals before and after use, to prevent the spread of pests. and amend to the following conditions; (g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket with a curved flat base, and a slatted back that permits the easy drainage of water and fish back into the drain which reduces the likelihood of pest plant	Supports in principle Rule R121, which permits the removal of vegetation or bed material and associated sediment from any drain or highly modified river or stream, as this is an appropriate status for these activities. Good practice for managing the control of pest plant and animals species is for all machinery to be inspected and if needed, cleaned before machinery or equipment is used in any waterway, including drains. Cleaning should also take place after use and before moving to another location. Machinery should not allow the return of pest plants to a drain, particularly where maintenance activity results in fragments of pest plants being returned to a drain. Such an activity is likely to cause the spread of pest

Specific Provision	Request	Reason
	material being spread through the drain, and (j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted Organism under the Biosecurity Act 1993), and Or any other equivalent change	plants, and where the pest plants are Unwanted Organisms (UO's) under the Biosecurity Act 1993, this is a breach of the Act. Similarly any actions that cause the spread of pest animals, including pest fish that are UOs is a breach of the Act.
Rule R122: Removing vegetation – permitted activity	Relief sought Amend the rule in terms of the changes to the following conditions; (h) if mechanically clearing aquatic vegetation from an area of river or lake bed covered with water, the machinery must use a weed bucket with a curved flat base , and a slatted back that permits the easy drainage of water and fish back into the drain and which reduces the likelihood of pest plant material being spread through the river, and (j) floating debris and plant	Same reason as for Rule 121.
	material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, or listed as an Unwanted	

Specific Provision	Request	Reason	
	Organism under the Biosecurity Act 1993), and	110 May 110 Ma	
	Or any other equivalent change		

- 6. The submitter wishes $\frac{1}{2}$ does not wish to be heard in support of its submission
- 7. If others make a similar submission the submitter does / does not want to present a joint case at a hearing.

Signature of submitter 4/6 Date 22 OCTOBER 2015
RAYMAND BRIAN CHAIG



Proposed Natural Resources Plan:

Submitter:

Glen and Angie Meredith

Submitter Number:

S432

Wellington Regional Council

0 8 OCT 2015

RD12 Masterton 5 October 2015

Mr Chris Laidlaw Chair Greater Wellington Regional Council PO Box 11646 Wellington 6142

Dear Mr Laidlaw

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Sites of Significance, Orui Station, Riversdale Beach.

My family own and farm Orui Station by Riversdale Beach on the Wairarapa East Coast. We have farmed Orui since 1852 through floods, drought, pestilence and, more recently, TB.

We have farmed in harmony with local lwi, the Riversdale, Homewood and Wairarapa Communities and, as your staff will tell you, been involved with the Greater Wellington Region.

We are committed to the local area and heavily involved with it.

We wish to submit on the 'Draft Natural Resources Plan for the Wellington Region'.

My apologies for not commenting earlier but with lambing, docking, calving and moving into spring it is a frenetic time of year.

The first point I would like to make involves Schedule C5, Map 7, Sites of Significance to Ngati Kahungunu ki Wairarapa and Rangitane o Wairarapa.

The map shows a red line from Motuwaireka Stream to the Whareama River which will exclude all stock from 2018.

That coastal strip is of vital importance. We currently farm 9000 stock units and, if the proposal went ahead, we would lose at least 1800 because of our inability to graze the land.

From an animal welfare perspective it is also an extremely important part of our enterprise as we use the coast to graze our hogget's'. It is a sheltered area.

Finally, that thin coastal strip provides the access from the South of the property to the North. To try and do this by any other means would involve horrendous expense with bulldozing, fencing and, inevitably planting to try and mitigate the erosion caused by the development of new tracks.

To reiterate that coastal strip is pivotal to the successful farming of Orui Station.

Further it is somewhat naïve to suggest we fence the area off. For a start in the current climate we can't afford to, in addition it would be a pointless exercise.

The coast, as you would know, is in constant change. A fence today is a beach tomorrow. Our position is, simply, access for stock, animal welfare and economic farming. Trying to fence that strip is exorbitantly expensive and totally impractical.



That proposed move, as I have stated, will make the farming of Orui extremely difficult if not impossible.

Looking at the map of 'Sites of Significance' it seems, for whatever reason, Orui is completely targeted while no other Wairarapa stations or coastal farms are.

I would, respectfully, like to ask why our farm is a place of 'national significance', who made the decision and on what grounds.

Orui does have good Paua beds and, until proved otherwise, we let locals collect the legal limit and size of catch.

There has never been a problem I'm aware of in that regard.

Since 1835 we haven't had an issue with the local lwi, I was under the sincere impression we were part of a team.

I was, therefore, somewhat surprised to hear our land could be subject to forfeit to that lwi by the Greater Wellington Regional Council.

I am aware of Maori villages in several areas of coastal Wairarapa South of Riversdale Beach. It seems, by the map I was given, that there are no red lines in those areas.

Further there is absolutely no evidence of Maori settlement, cultivation or burial sites on Orui. How it is a 'site of significance' when other areas with evidence of settlement aren't?

The evidence just doesn't add up.

In her historical text, 'Canoes of Kupe' by Roberta McIntyre there is considerable discussion on early Maori at Cape Palliser and in Southern Wairarapa.

There was 'extensive population on the South Coast that moved up the (Ruamahanga) valley during winter.

In the years to come we read: 'Those Palliser dwellers then began to penetrate along lakes, rivers and creeks to take advantage of the fertile soils, shelter and fresh water in the Wairarapa Valley'.

The Wairarapa Valley is a long way from Riversdale.

That sentiment is echoed in AG Bagnall's book, 'Wairarapa – An Historical Perspective'.

Bagnall talks extensively of Maori occupation in the South, not near the Riversdale or Castlepoint coasts.

The argument has been floated that Maori used the area for gathering food on their way North along the coast.



I have two issues with that. The first is the Regional Council suggesting that wherever Maori may or may not have gathered food is grounds for a claim.

Second, I can find no proof that Maori ever did gather food here in historic times. They do today with my permission.

So can I respectfully ask for some concrete proof before my land is confiscated?

There is an additional and, if I could suggest, a somewhat bizarre suggestion in the Plan that Schedule F3 is suggesting fencing wetlands.

At Orui we take our wetlands extremely seriously. We have reduced our breeding herd from 1300 cows to just 170.

Those wetlands have remained pristine over the 160 years we have farmed the land so why the impost?

We are looking after the wetlands and did so long before the GWRC came into being and have done for generations.

Trying to fence that land in a changing coastal climate is, at best, impractical as the dunes are constantly moving.

I would like to speak to this submission.

Yours sincerely

Angie Meredith

Cc Alastair Scott MP; Ron Mark MP, Lyn Patterson, Mayor of Masterton.



Proposed Natural Resources Plan:

Submitter:

Manganui Partnership Limited

Submitter Number:

S433

543°

SUBMISSION on the proposed Natural Resources Plan for the Wellington Region

To: regionalplan@gw.govt.nz OR Freepost 3156, GWRC, PO Box 11646, Wellington 6142

Name	
	MANGANUI PARTNERSHIP LIMITED
Farm Name	MANGANUI
Physical Address	2812 WESTERN LAKE ROAD RD3 FEATHERSTON
Phone Number	(06) 3077718
Email Address	davies.n.a & Carmside.co.nz

Communication from GWRC: I prefer email OR hardmail choose one

Trade competition: I could not gain an advantage in trade competition through the submission

Hearing: I wish to be heard and would consider jointly appearing with other submitters

Support: I support Wairarapa Federated Farmers submission

INTRODUCTION - Key Points about farm/business

Farm Type	Eg, Sheep, Beef , Arable, Dairy, agricultural business
Farm size (area)	586 hectares
Main	
Waterways	
GW Soil plan or Farm Plan	Yes No
Environmental investments	fenced riparian areas, waterways and wetlands - Native Bush retired + Penced
QE2 or	
Retirement	
Blocks	
General Comments	Eg, if you like the partnership approach with council staff on the ground, say so



SUBMISSION on the proposed Natural Resources Plan for the Wellington Region

To: regionalplan@gw.govt.nz OR Freepost 3156, GWRC, PO Box 11646, Wellington 6142

Name	Quentin Connell (NZDFA – Wairarapa Branch Vice-Chair)
Organisation	New Zealand Deer Farmers' Association – Wairarapa Branch (NZDFA-Wairarapa)
Physical Address	121 Perry's Rd. RD 7 Masterton
Phone Number	063771154
Email Address	Connell.brookes@clear.net.nz

Communication from GWRC: NZDFA-Wairarapa prefers hardmail

Trade competition: NZDFA-Wairarapa could not gain an advantage in trade competition through the submission

Hearing: NZDFA-Wairarapa wishes to be heard and would consider jointly appearing with other submitters

Support: NZDFA-Wairarapa supports submissions from Wairarapa Federated Farmers and Beef + Lamb New Zealand

Signature

NZDFA NZ Deer Farmers Association

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INTRODUCTION

Deer Farming and the New Zealand Deer Farmers' Association – Wairarapa Branch

The Wairarapa Branch of the New Zealand Deer Farmers' Association (NZDFA-Wairarapa) welcomes the opportunity to provide a submission on the proposed Natural Resources Plan for the Wellington Region. NZDFA-Wairarapa represents the national and regional interests of over 50 deer farmers.

The New Zealand Deer Farmers' Association (NZDFA) is a voluntary subscription funded incorporated society representing the regional and national interests of approximately 1400 financial members and an estimated 70 % of farmed deer. NZDFA expresses a political and functional view on behalf of all deer farmers and for industry good. It is governed by a national Executive Committee and has a strong regionally based network of 20 autonomous branches.

The NZDFA has a long association with Greater Wellington Regional Council (GW) in approaching environmental and land care challenges and implementing solutions: in particular the NZDFA in conjunction with Deer Industry New Zealand provided substantial input and information to the GW 2011 publication "A Guide to Managing Stock Access to Waterways in the Wellington Region" with much of the information being derived from the "New Zealand Deer Farmers' Landcare Manual" (2003 – and has since been updated in 2012).

While deer farming is a relatively new and small primary industry in New Zealand (the first licence to farm deer was issued in 1970), the New Zealand industry is the world's largest exporter of venison and deer velvet and arguably the biggest producer of deer velvet. Deer farming systems are based on the annual production of venison, velvet and deer co-products; as such they share many similarities with sheep and beef systems and can be focused on breeding or finishing, and located in fertile plains or hill and high country areas. It is estimated that about 70 % of deer farms are actually mixed livestock (sheep, beef or dairy grazing) and arable cropping can also be incorporated.

Support for submissions from Wairarapa Federated Farmers and Beef + Lamb New Zealand

NZDFA-Wairarapa supports the substantial submission from Wairarapa Federated Farmers which has informed a number of primary industry groupings of the Proposed Natural Resources Plan for the Wellington Region. In particular NZDFA-Wairarapa re-iterates the following areas that require further analysis or refinement:

- Primary production: Food production should be recognised in the values and as such a
 Section 32 report for primary production report should be commissioned prior to the
 hearings specifically for primary production values (i.e. the sum of the costs/benefits of all
 the proposed policies/rules for farming)
- Balancing objectives to maintain or improve water quality: While there are known 'hotspots'
 of poor water quality, overall the region's water quality is not at levels that require urgent
 efforts to improve water quality. Apart from identified localities (hotspots), approaches to
 improve water quality are best determined through the Whaitua process.

- Greater transparency of use of data or proposed numerics: Concerns outlined in the submission by Wairarapa Federated Farmers are listed in its "Critical Recommendations" but two examples demonstrate the need for more explicit justification for positions proposed in the Plan.
 - Aquatic ecosystem health and mahinga kai objectives: Numeric values in Table 3.4 diverge markedly from current state without benefit of any supporting explanation or analysis of implications (through the s32 report) and some of the proposed numbers seem to be arbitrary selections, un-informed by accepted national bands.
 - Important trout fishery rivers and spawning waters: Schedule I lists rivers unsupported by any criteria of "importance" and ill-supported by evidence in the supporting papers, while Map 22 is not at sufficient scale to delineate the boundaries.

NZDFA-Wairarapa also supports the submission from Beef + Lamb New Zealand: As deer farming typically involves mixed livestock (drystock) and ranges from intensive finishing to extensive breeding production systems the issues encountered will tend to be the same as those for more traditional sheep and beef farms. The submissions from Beef + Lamb New Zealand and Wairarapa Federated Farmers will reflect these issues.

Support for Greater Wellington Regional Council's Activities

NZDFA-Wairarapa wishes to acknowledge the historical and current council-led environmental initiatives that have assisted the farming community in the region to continue to produce high quality products for domestic and export markets, while minimizing adverse impacts on the region's natural resources.

In particular the long-running soil conservation programme is well-regarded amongst Wairarapa farmers, which is supported by the Akura nursery supplying appropriate plant material for soil conservation on-farm and native restoration activities. Greater Wellington's support of the Ballance Farm Environment Awards in the region also provides opportunities for the farming community to view sustainable land management in a business context and allows farmers to see workable practices in operation.

NZDFA-Wairarapa would support ongoing council initiatives such as these and encourages partnership approaches with primary industry organisations, individual farmers and the council.

Specific rules in the proposed plan pertinent to deer farming

NZDFA-Wairarapa has provided submissions below on specific rules that it deems to be pertinent to deer farming that may not be captured by other submitters.

STOCK EXCLUSION

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Definition of Category Two waterbodies, including water races and drains > 1 metre

Schedule I and Map 22: important trout spawning habitat

Rule 97: access to the beds of surface waterbodies by livestock

- Stock exclusion from Category One waterbodies by July 2018
- Stock exclusion from Category Two waterbodies by July 2022

NZDFA-Wairarapa's submission is: support/oppose

Changes Sought	Comments and Reasons
Extend the timeframes for stock exclusion, e.g. • Category One by 2020	As there does not appear to be any stated rationale for the timeframes, and there has been no cost-benefit analysis undertaken it would be more prudent to allow sufficient time for farmers to i) plan and ii) budget for activities that achieve stock exclusion.
Category Two by 2025	Fencing will be an important component in stock exclusion and for deer farming costs are at least twice as much as conventional fencing for sheep or cattle / dairy cows. Temporary electric fencing is currently not a viable option. A longer timeframe will allow farmers to prioritise surface waterbodies that require deer fencing and spread costs out so that they are affordable and do-able.
	It should be noted that a Land and Water Forum stock exclusion "flexigroup" (technical working group) has provided indicative timeframes for stock exclusion by 2025 for deer and beef cattle on plains and by 2030 for deer and beef cattle on lowland hills (rolling hills or downlands).
Sheep or goats are not excluded from Category One	Where stock exclusion results in riparian buffer zones or vegetated set-backs, periodic management of vegetation (weed control, excessive pasture growth) may be required to maintain effectiveness of these areas or indeed enhance in-stream ecological conditions.
	As sheep or goats will not willingly stand in water, their use in controlling vegetation growth next to waterbodies is cost-effective and practical, while the risk of direct discharge of sediment and excreta is low.
Specify that stock exclusion from spawning sites – inanga or trout – is during the spawning season.	Stock exclusion from Category Two waterbodies on the basis of trout spawning should be time bound and apply during the spawning season as defined on page 164 of the proposed Natural Resources Plan for the Wellington Region

Changes Sought	Comments and Reasons
Specify criteria for "important" trout spawning rivers; delete those that don't meet the criteria	A more rigorous analysis of evidence against specified criteria should be undertaken prior to re-drafting schedule I and Map 22
Amend the definitions of stock crossing to match hill country practicalities and effects	The current definition is very specific and is unlikely to reflect on-the-ground practicalities, particularly in the extensive hill country in the region. The requirement that entry/exit points are "directly opposite each other" will be relatively easy (and logical) in lowland/plains areas with gentle topography, but much less certain in hill country where river bends, banks and other landforms may dictate entry and exit points
Allow for stock drinking points	Excluding stock from waterbodies will require an alternative supply of drinking water for stock, but where this is not possible or not affordable, limited access to waterbodies may be required. Good design can minimise impacts to water quality such as an example provided in "The New Zealand Deer Farmers' Landcare Manual 2012" on page 18 (follow the link here).
	NZDFA-Wairarapa also wishes the council to acknowledge that stock exclusion involves a significant cost to the land owner. Over and above any exclusion measure (typically fencing) there will be costs of establishing alternative stock water supplies and maintenance of river banks (such as establishment of riparian plantings and weed/vegetation management).

In addition to the above changes sought, NZDFA-Wairarapa wish to provide additional contextual information regarding deer and deer farming that is hoped will inform Greater Wellington in appropriately implementing rules and methods to maintain or enhance water quality of surface water bodies.

- Deer do not stand in water in large groups: Deer entering waterways tend to be young aged animals (playing rather than seeking water) so this is managed by excluding mobs of young animals from paddocks by waterways. In addition deer do not tend to linger in waterways with gravelled beds, but may look to create wallows next to waterways with muddy beds.
- The major issues identified by farmers and confirmed by research are i) erosion along fence lines created by deer pacing up and down fence lines in response to behavioural stress or disturbance, and ii) wallowing.
- Deer pacing along fence lines when under stress creates channels which then transport sediment, phosphorus and faecal matter to waterways. Exclusion of deer from waterways will not solve this issue, but rather providing adequate feed, reducing stocking rate, removing other livestock (e.g. presence of bulls in neighbouring paddocks) or shifting to different paddocks will reduce stress and as a result eliminate fence pacing.
- Some deer varieties (English and European Reds) do tend to wallow and if wallows are connected to waterways then this effectively creates point sources for faecal matter, nitrogen, phosphorus and sediment. Fencing off waterways or stock exclusion does not prevent this problem. The solutions are to fence off and fill in the wallows; divert wallow drainage away from waterways (e.g. to constructed wetlands); construct alternative wallows away from the waterways; remove stock. Other varieties (Wapiti and Eastern Reds) wallow less frequently and Fallow deer do not wallow at all.

While NZDFA-Wairarapa recognises that deer and cattle can and do seek out water in comparison to sheep, the behaviour is not the same for all species/varieties and the contamination risks and impacts on water quality require different approaches. In addition NZDFA-Wairarapa considers that stocking rate is a significant factor on the impact of livestock farming on water quality. Stock exclusion *per se* would be most effective in production systems where stock are intensively farmed, but not cost-effective in more extensive production systems (particularly in hill country) where there are fewer livestock per hectare and likely to be more waterways.

Deer fencing costs typically range from \$20 – 30 per metre (not including labour and does not include additional costs for establishing and managing any vegetated riparian/buffer zones). This high cost has real and significant potential to make deer farming a marginal activity compared with alternative land uses and any subsequent de-stocking of deer and a change in land use does not quarantee reduced impacts on in-stream water quality.

FERTILISER

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Rule R82: Application of fertilizer – permitted activity, provided

Condition a) not into or onto a surface water body or beyond the boundary, including as a result of wind drift

NZDFA-Wairarapa's submission is: support/oppose

Changes Sought	Comments and Reasons
Amend condition a) to reflect the practicalities of aerial fertiliser application	It is impossible to miss all intermittent surface waterbodies when using a plane or helicopter. Technology is being developed to allow this but it is not commercially available.
аррисации	Condition a) will cause a health and safety risk to the operation of aerial fertilizer application.
	Environment Canterbury's operative Land and Water Plan rule for aerial fertiliser application provides a pragmatic approach:
	5.66 The discharge of fertiliser from an aircraft onto or into land in circumstances where a contaminant may enter water and into any river is a permitted activity, provided the following conditions are met:
	There is no fertiliser discharged when the soil moisture exceeds field capacity and
	 Fertiliser is not discharged directly into or within 10 m of the bed of a permanently flowing river or artificial watercourse that is more than 2 m wide, any lake, or any wetland boundary or any significant indigenous biodiversity site identified in the relevant district plan
	Similarly Horizons Regional Council's One Plan Rule 14-5 allows fertiliser application to be a permitted activity as long as there is no <i>direct</i> discharge into a surface water body and that reasonable measures are taken to prevent this.

OFFAL PITS, FARM REFUSE DUMPS

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Rule R89: Farm Refuse Dumps – 15 conditions

Rule R91: Offal Pit – 9 conditions

NZDFA-Wairarapa's submission is: support/oppose

Changes Sought	Comments and Reasons
Rule 89: Farm Refuse Dumps	These are existing activities on farms. NZDFA-Wairarapa
- increase size from 50 m ³ to 100 m ³	is unaware of any monitoring
- heavily prune the fourteen other conditions to focus on clear effects	or studies that show that refuse dumps or offal pits
Rule 91: Offal Pits	significantly contribute to adverse impacts on water or
- retain condition a) re only containing dead matter from the property; and condition h) odour is not offensive beyond the boundary	air quality and so multiple conditions are not needed.
- heavily prune the other seven conditions to focus on effects	

SILAGE

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Definition: a fermented high moisture stored fodder

Rule R90: manufacture and storage of silage and compost, including

 Condition d) the walls and floor of a silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water

NZDFA-Wairarapa's submission is: support/oppose

Changes Sought	Comments and Reasons
Change the	Self-explanatory
definition to specify	
this does not	
include baleage	
Delete the	Impermeable lining will impose additional costs that may not contribute to a
requirement for	beneficial environmental outcome – a cost-benefit analysis would be helpful for
impermeable lining; retain the condition that there be no	this requirement. The condition that there is no discharge to water is more appropriate.
discharge to water	NZDFA-Wairarapa notes that (good quality) silage made to 30 % dry matter or more does not generally create leachate issues. As the production of good quality silage is a <i>production</i> good management practice this would be a more cost-effective approach to minimising leachate as opposed to impermeable lining requirements.

CULTIVATION & BREAKFEEDING

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Rule 94: Cultivation & Rule 95: Break feeding

 Cultivation/break feeding shall not occur within 5 m of a surface waterbody, including open drains and water races

NZDFA-Wairarapa's submission is: support/oppose

Changes Sought	Comments and Reasons
Delete the conditions requiring 5 m setbacks	The 5 m distance is arbitrary and does not take into account slope and soil type. Also the setback land could be bare ground which would not prevent any run off entering the water body. The pan-primary industry booklet "Industry-agreed Good Management Practices relating to water quality" provides a range of guidance measures to minimize overland flow of sediment and faecal bacteria into water bodies (page 13). It does not prescribe any one measure as the effectiveness is dependent on the specific situation and indeed a combination of mitigation measures may be more effective than a single blunt rule. Such risk-based approaches are more appropriately covered under the plan Methods relating to Good Management Practice

EARTHWORKS

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Definition of earthworks

Rule R99: earthworks of a contiguous area up to 3000 m² per property per 12 months – permitted

Rule R101: earthworks that doesn't meet permitted conditions - discretionary

NZDFA-Wairarapa's submission is: support/oppose

Changes Sought	Comments and Reasons
Amend the definition and Rule 99 to allow construction of farm tracks as a permitted activity, as well as maintenance	The requirement for the earthworks to be a single contiguous area of disturbance prevents normal track construction or maintenance, or other minor earthworks such as the establishment of stock handling yards, from being considered as a permitted activity. Deer raceways are an important feature of deer farming that allows the quick, safe and low environmental impact movement of deer between paddock and deer shed. It seems unwarranted to require farm tracks and maintenance to be a discretionary activity (Rule R101).
Change Rule 101 to controlled or restricted discretionary with clear conditions	

VEGETATION CLEARANCE ON EROSION-PRONE LAND

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Definition of erosion-prone: slope that is greater than 20 degrees

Definition of vegetation clearance: clearance of woody vegetation (exotic or native) by mechanical or chemical means including felling, spraying by hand or aerial means, hand clearance and burning

Rule R101: vegetation clearance that doesn't meet permitted conditions – discretionary

NZDFA-Wairarapa's submission is: support/oppose

Changes Sought	Comments and Reasons
Change definition of erosion prone	A pre-existing slope of 20° seems to be an entirely arbitrary threshold that does not take into account factors such as underlying parent material, soil type, climate and slope aspect. This is surprising since Greater Wellington has a very successful and well-regarded hill country erosion programme with perhaps some of the most qualified experts and practitioners in on-farm assessment of soil erosion in the country.
	A better definition would be to use the well-recognised Land Use Capability (LUC) system to assess erosion prone-ness, while arguably the best approach would be to adopt the Landcare Research developed model for assessing hill country erosion that was adopted by Horizons Regional Council to determine its areas of highly erodible land. Since the model already has the ability to cover landforms in Greater Wellington this should be a relatively straightforward process involving established science that underpins a neighbouring regional council's policies. It is also worth noting that this model has thresholds ranging from 24° on weak Tertiary-age mudstone to 45° on hard greywacke.
Change definition of vegetation clearance to exclude hand clearance, hand or aerial spraying and roller crushing	While long-term/permanent removal of vegetation cover on erosion prone land greatly increases the risk of erosion, vegetation clearance that retains plant material <i>in situ</i> and particularly root structures does afford some soil protection while new vegetative cover is establishing.
Change Rule 101 to controlled or restricted discretionary with clear conditions	

CULVERTS & BRIDGES

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Rule R114: weirs, fords, small bridges - permitted if

- not >20 m² in size / footprint
- catchment not >50 ha west of the Ruamahanga, 200 ha east of the Ruamahanga

Rule R115: culverts - permitted if

■ not >20 m length and not >0.3 m -1.2 m diameter

Rule R125: small river crossings, dams, structures in a mana whenua site – restricted discretionary

NZDFA-Wairarapa's submission is: support/oppose

Changes Sought	Comments and Reasons
Rule 114: - Change the 50 ha catchment restriction to 200 ha	Clarify the rationale for the difference in catchment areas depending on which side of the Ruamahanga and provide supporting evidence for the rationale, otherwise these should be consistent.
Increase the size for fords and bridges (20 m² too small)	The use of fords and stock crossings for <i>intermittent</i> use particularly in hill country may have short-lived and minimal environmental impact. What is the basis for a footprint of 20 m ² ?
Provide advice to landowner of appropriate culvert sizes to achieve the above condition	An upper limit for culvert diameter seems counter intuitive to the purpose of the culvert. Council advice (e.g. land management or flood protection expertise) could provide a better outcome and design.
Rule 125: Undertake proper assessment of restrictions proposed for mana whenua sites within the plan itself.	Do not leave this to a consent process at landowner cost – this creates more uncertainty as to who is appropriate and qualified to undertake an assessment.

Submission on the Proposed Natural Resources Plan for the Wellington Region

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:

regionalplan@gw.govt.nz

Send to:

INSTRUCTIONS PDF

Your details:

Full name:

Raquel Moreno

Forest Owner Marketing Services Ltd. (FOMS) Company name:

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Address2:

Address3: Address4: Town

Feilding

Telephone Work: Postcode:

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63235621

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Telephone Cell:

Telephone Home:

raquel.moreno@foms.co.nz Email address:

Trade competition

Yes

I/we could not gain an advantage in trade competition through this submission

I/we could gain an advantage in trade competition through this submission. ž

If you could gain an advantage please complete one of the following:

I/we are directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition. I/we are not directly affected by an effect of the subject matter of my submission that adversely affects the environment

and does not relate to trade competition or the effects of trade competition.

Attendance and wish to be heard at hearing(s)

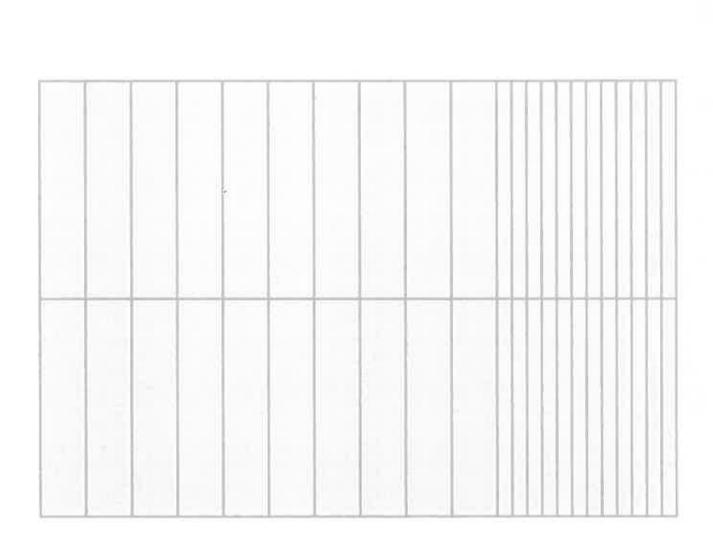
//we do wish to be heard in support of my/your submission

[Note: this means that you wish to speak in support of your submission at the hearing(s).]

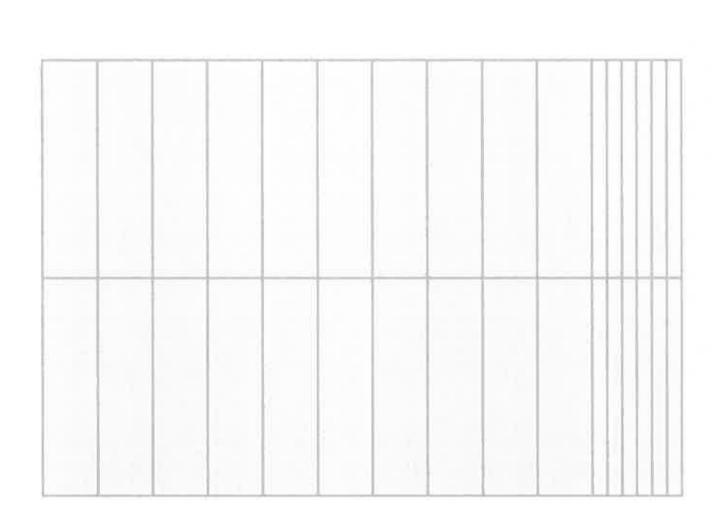
Yes	I/we do not wish to be heard in support of my/our submission
	[Note: this means that you cannot speak at the hearing. However, you will still retain your right to appeal
	any decision made by the Wellington Regional Council to the Environment Court.]
No	If other make a similar submission, I will consider presenting a joint case with them at a hearing.

Date:

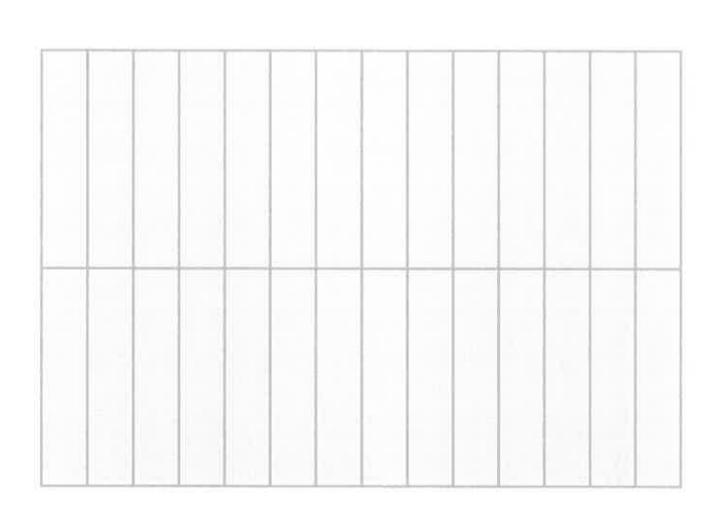
I seek the following from WRC (give precise details):	for The defintion should be aligned within NESPF so it should be considered as plantation forestry an area of at least 1 ha	with Keep the erosion prone land definition as it was in the previous ry plan ("any land within Area 1 with a slope of greater than 23 rmitted degrees; and any land within Area 2 with a slope of greater as area of than 28 degrees") or otherwise use the erosion susceptibility ore classification contained in NESPF for a	8			
Reasons for my submission:	Inconsistency with National Environmental Standards for Plantation Forestry (NESPF)	More stringent than the current plan and consistency with National Envionmental Standards for Plantation Forestry (NESPF). In the current plan for GWRC the slope for permitted activity is 23 degrees and 28 degrees depending on the area of the region. What is the rationale to make this slope more stringent? Furthermore, if NESPF comes into force later next year, they have set up a maximum slope of 25 degrees for a permitted activity, apart from taking into account other attributes such as soil and rock base (among others)				
My submission on this provision is:	Amend	Amend				
Interpretation	Plantation forestry harvesting	Erosion prone land				

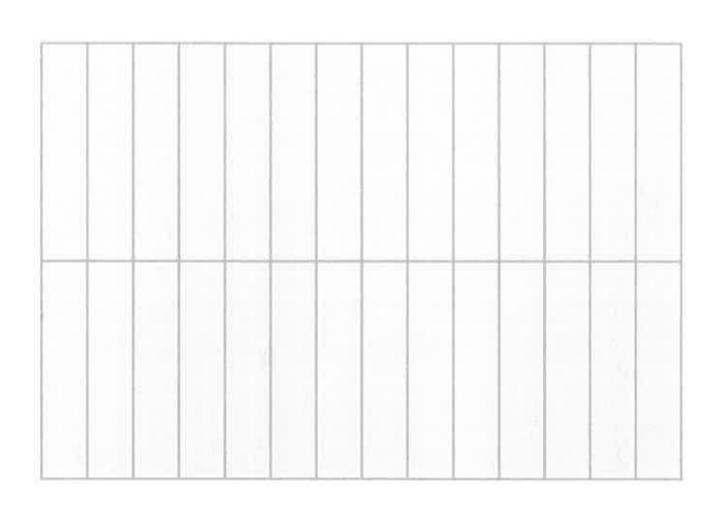


I seek the following from WRC (give precise details):	Include Forestry as beneficial use of land and water resources.					
Reasons for my submission:	Forestry delivers a wide range of benefits including improving Include Forestry as beneficial use of land and water resources. water quality, erosion control, carbon sequestration and employment.					
My submission on this provision is:	Amend					
Policies	Policy P7: Uses of land and water	NI .				



Change the rule and require the plan to state dependance on the scale and environmental values of the operation						
g) Prepare a spray plan at least once per annum. That should be required only within sensitive areas and large operations.						
Amend						
Rule R36: Agrichemicals – permitted activity						





Rules - Land use	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Rule R99: Earthworks-permitted activity	Amend	The rule sets up 3,000m2 per property per 12 month period. Currently this is 1,000 m3 of soil within any 10,000 m2 per 12 month period. What is the rationale to make it more stringent?	Keep it as it was in the previous plan or align it with NESPF rule for earthworks. Leave the quantity of earthworks as they are now by requiring an erosion and sediment control plan on erosion prone land and available to the council on request (as NESPF)
Rule R101: Earthworks and vegetation clearance – discretionary activity	Amend	As rule 100 is only for vegetation clearance that is on erosion prone land and rule 101 says that "vegetation clearance that is not permitted by Rule 99 or R100 is a discretionary activity, what happens with vegetation clearance on non-erosion prone land? The intention of these rules (R99,100,101) is not clear as vegetation clearance that is not on erosion prone land will be under rule 101 which will require a consent.	It needs to be clarified and re-worded.
Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Support	Is good to have a rule that includes plantation forestry activities. We find the provision of a permitted activity on erosion prone land yet plantation forestry harvesting as immediately a controlled activity principally wrong.	Provision of permitted activity for plantation forestry harvesting.
Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Not stated	Rule 102 allows plantation forestry harvesting on erosion prone land following conditions and Rule 103 says that plantation forestry harvesting that is not permitted under rule 102 is a controlled activity. What is it when plantation forestry harvesting is on a NON erosion prone land?	Rule 102 A. Plantation forestry harvesting Rule 102 B. Plantation forestry harvesting on erosion prone land Rule 102A should be more permissive (without requiring a complex harvest plan as well as detailed erosion/sediment control plan) Rule 102B will require an erosion and sediment control plan (as the harvesting is on erosion prone land) available to the council on request.

Submitted to the council 20 working days prior to the notification time: plantation forestry harvesting and provide the submission of a harvest plan and reduce the submission of a harvest plan and reduce the submitted activity plantation forestry harvesting. This condition is impractical a) for small scale, low complexity and slope <25 degrees within small scale and low complexity operations. Is not logical permitted activities, 48 hours (it will be under Rule 102A). to plan and submit a harvest plan within 20 working days b) for permitted activities on slopes >25 degrees (erosion under a permitted activity operation as this time of notification c) rest of operations cataloged as non permitted activities, 20 doesn't give any flexibility to operate under a permitted activity gays has to be required only for larger operations (more than 10 ha) and non permitted activities.	The FAID?: Plantation forestry harvesting on erosion prone land – permitted activity cause to the condition of "stab is removed from a surface water body where it is blocking river flow and promitted activity cause described by the cause of the cause o	
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Rule R104: Structures in natural wetlands and significant natural wetlands – permitted activity	Not stated	There is no rule for plantation forestry harvesting as a permitted activity on or around natural wetlands. This rule (R104) is only applicable for hunting and recreational purposes. There are temporary activities such as crossing upper reaches of wetlands using corduroy logs or supportive material to facilitate harvesting which should be allowable under a permitted activity subject to certain practical conditions.	Have a harvesting permitted activity rule for natural wetlands.
Rule R104: Structures in natural wetlands and significant natural wetlands – permitted activity	Amend	General conditions for wetlands. As logs are by definition "contaminants" the condition a) restrict the use of logs as corduroy in a crossing. As part of the permitted activity it should be allowed to use logs as a corduroy for a temporary crossing on natural wetlands provided it is removed after harvesting operations.	Allow logs for corduroy temporary crossings on natural wetlands.
Beds of lakes and rivers general conditions	Amend	Inconsistency with National Environmental Standards for Plantation Forestry (NESPF). Condition c) stipulates that "all machinery, equipment and materials used for the activity shall be removed from the river or lake bed every night". NESPF general conditions for crossings estates " all excess construction materials and equipment are removed from the bed of the water body within five working days"	Reword the condition as "shall be removed from the river or lake within five working days" to be aligned within NESPF.
Rule R104: Structures in natural wetlands and significant natural wetlands – permitted activity	Amend	General conditions for wetlands. As logs are by definition "contaminants" the condition a) restrict the use of logs as corduroy in a crossing. As part of the permitted activity it should be allowed to use logs as a corduroy for a temporary crossing on natural wetlands provided it is removed after harvesting operations. The definition of natural wetlands has lead to the submission on this rule as oposed to a temporary crossing across a river/stream.	Allow logs for corduroy temporary crossings on natural wetlands.
Rule R114: River crossing structures – permitted activity	Not stated	What about temporary structures/crossings?	Include temporary crossings specific conditions as when the material needs to be removed and that erosion and sediment controls are installed

Reconsider the rule to be aligned with NESPF rule for river crossings/single culverts. Condition (x) stipulates that a minimum culvert installation depth below the bed of 20% of the width of the culvert.

NESPF stipulates "... culvert invert is at least 100 mm below the Amend Rule R115: Culverts - permitted activity

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