

Proposed Natural Resources Plan:

Submitter:

**Joe Hintz**

Submitter Number:

**S401**



#1531159

5401

Wellington Regional Council

30 OCT 2015

**SUBMISSION on the proposed Natural Resources Plan for the Wellington Region**

To: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz) OR Freepost 3156, GWRC, PO Box 11646, Wellington 6142

Name	Joe Hintz
Farm Name	Wainuioru station LTD
Physical Address	518 Te kopi Rd R.D 4 Mstr
Phone Number	06 372 7746
Email Address	

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	e.g. Sheep, Beef, Arable, Dairy, agricultural business
Farm size (area)	1017 hectares
Main Waterways	
GW Soil plan or Farm Plan	Yes. No
Environmental investments	/
QE2 or Retirement Blocks	/
General Comments	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:

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

### **Effluent Comment and Reasons**

*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*



## 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 3000m<sup>2</sup> 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*

## 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 >20m<sup>2</sup> 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 (20m<sup>2</sup> 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.*

## 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 from 50m<sup>3</sup> to 100m<sup>3</sup>
- 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

### **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.*

## 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*

**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/m<sup>3</sup> 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?*

Any other areas of concern – just copy format above



Proposed Natural Resources Plan:

Submitter:

**Derek Daniell**

Submitter Number:

**S402**



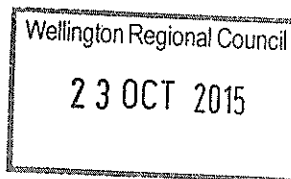
#1530577

S402

**Mark Sutherland**

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**From:** Regional Plan  
**Sent:** Friday, 23 October 2015 8:40 a.m.  
**To:** Records  
**Subject:** FW: Submission



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](http://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**



FORM 5: SUBMISSION FORM – 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

5403

#1525390

NAME/ORGANISATION

JOINT HOWARD ASSOCIATION INC

NUMBER STREET NAME

1 HOWARD RD

SUBURB/TOWN

POSTCODE

1 HOWARD, LOWER HUTT

5013

PHONE

EMAIL

21407123

roger.vanance.nz@gmail.com

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

What specific provision(s) of the Proposed Natural Resources Plan that my submission relates to is:

Please specify the provision/section number:

The Selection of Committees and the delegated authority.

My submission on this provision is:

- I support the provision
- I oppose the provision
- I wish to have the specific provision amended

Wellington Regional Council  
22 SEP 2015

Reasons for my submission:

As per attached.

Seek the following decision from WRC (give precise details):

As per attached.

Please continue on separate sheet(s) in similar format or download a submission form from www.gw.govt.nz/regional-plan-review

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.

Signature: 

Date: 17/9/15

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

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**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 be 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 individuals.

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](mailto:regionalplan@gw.govt.nz) OR Freepost 3156, GWRC, PO Box 11646, Wellington 6142

<b>Name</b>	<i>J.Q. &amp; P.M. Donald</i>
<b>Farm Name</b>	<i>Kowhai Flat</i>
<b>Physical Address</b>	<i>168c Hinakura Rd MARTINBOROUGH</i>
<b>Phone Number</b>	<i>063068169</i>
<b>Email Address</b>	<i>Kowhai.flat@xtra.co.nz</i>

**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**

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

## 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

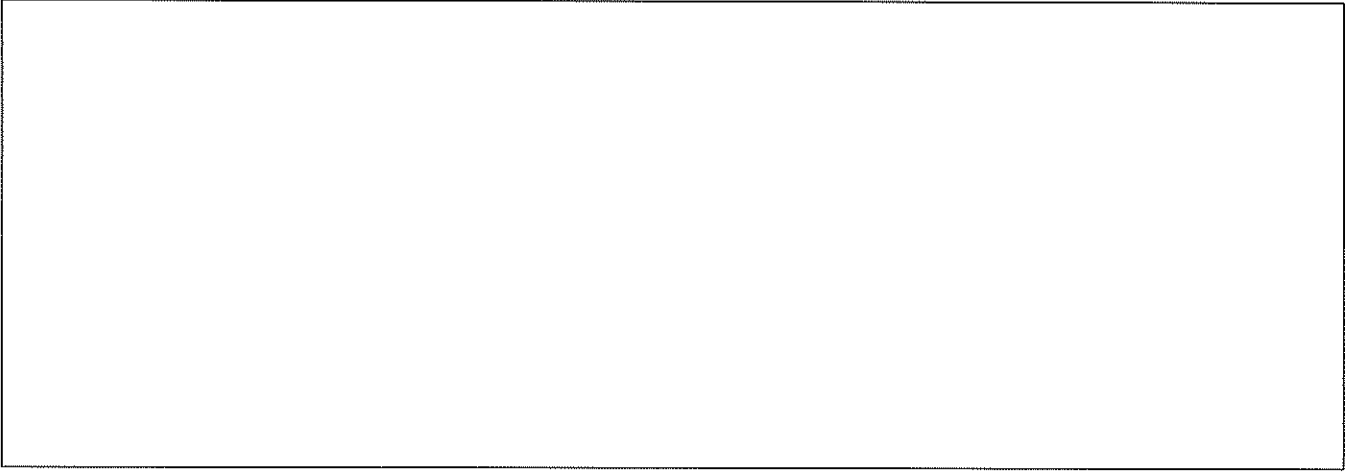
- Stock exclusion from Category One waterbodies by July 2018

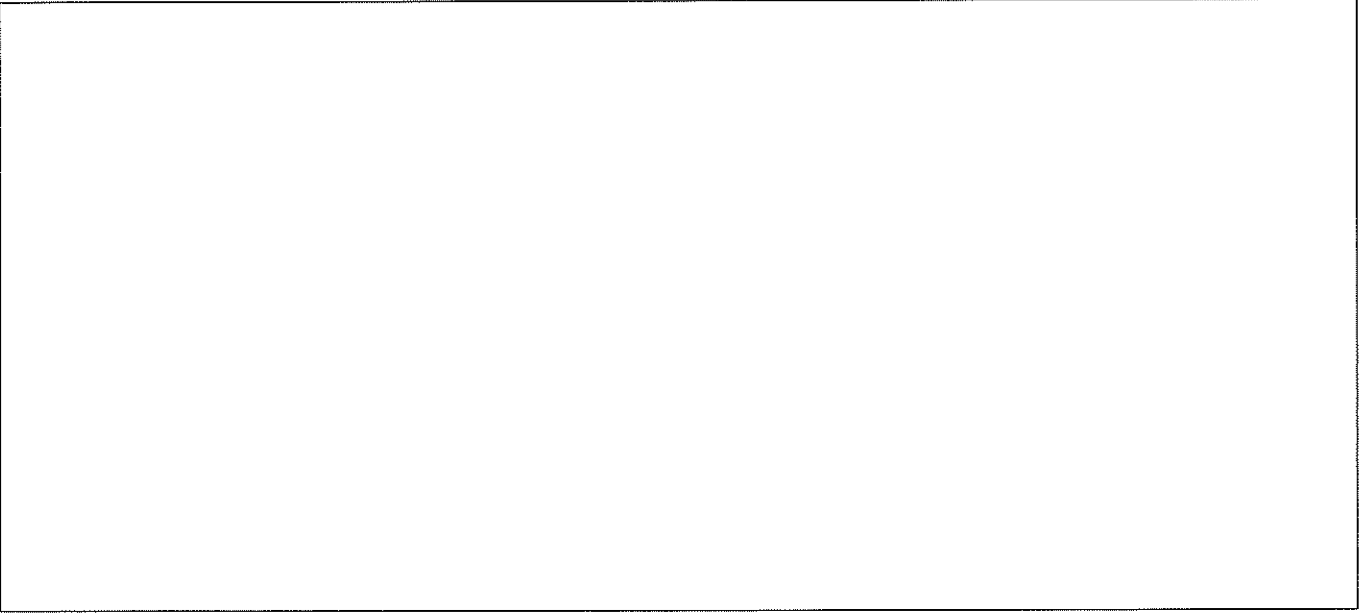
**My submission is: ~~support~~/oppose**

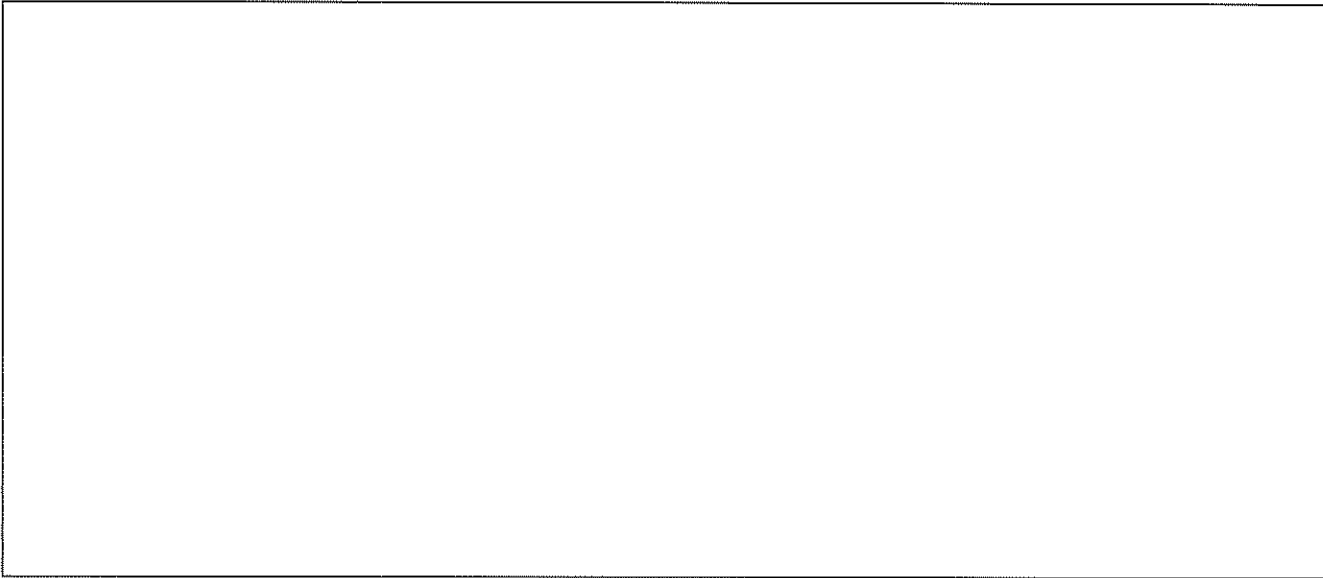
*Rule 97 is opposed*

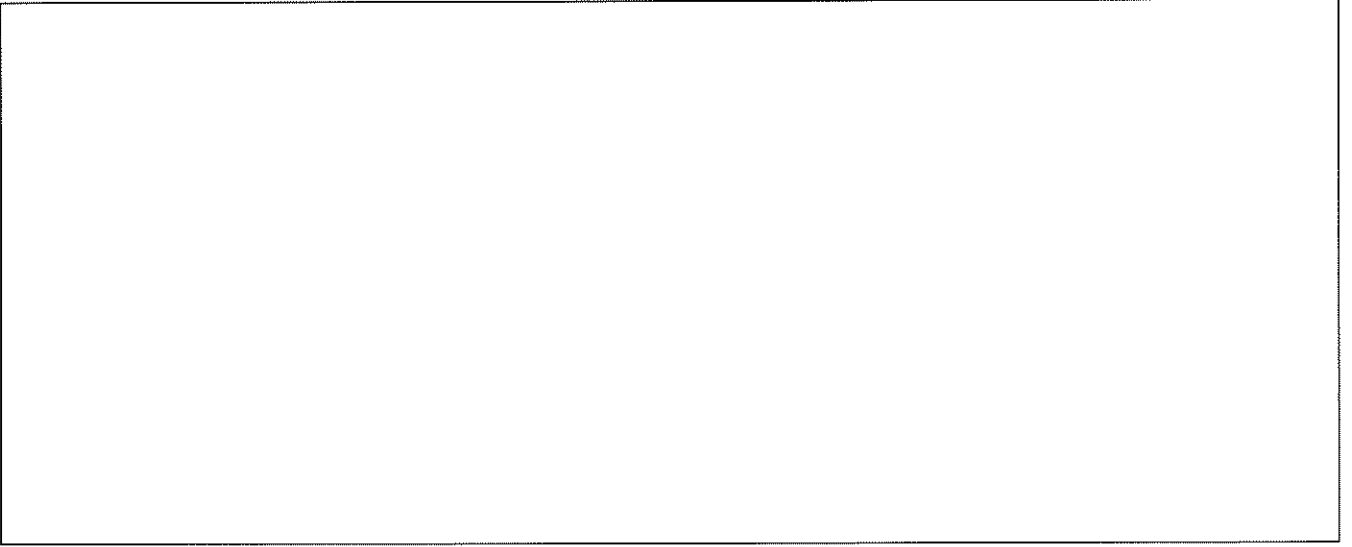
*Exclude the necessity for an A category 1 water body that does not carry permanent water and the exclusion of stock.*

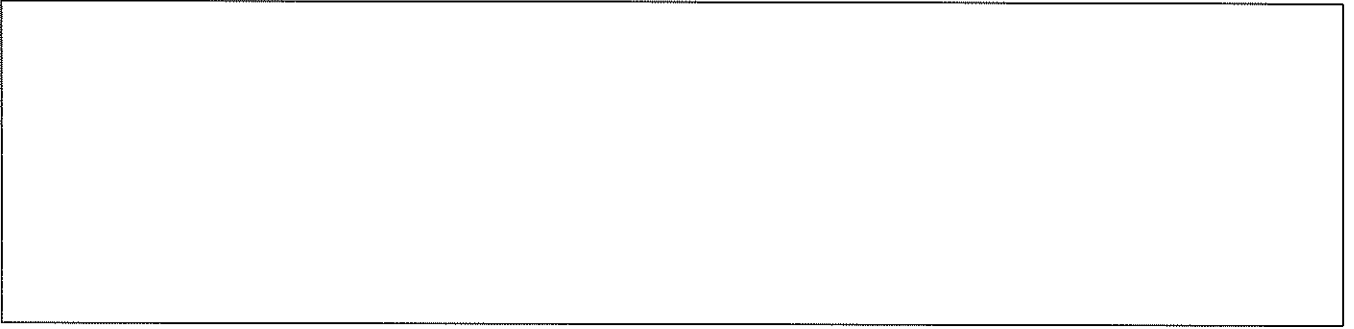


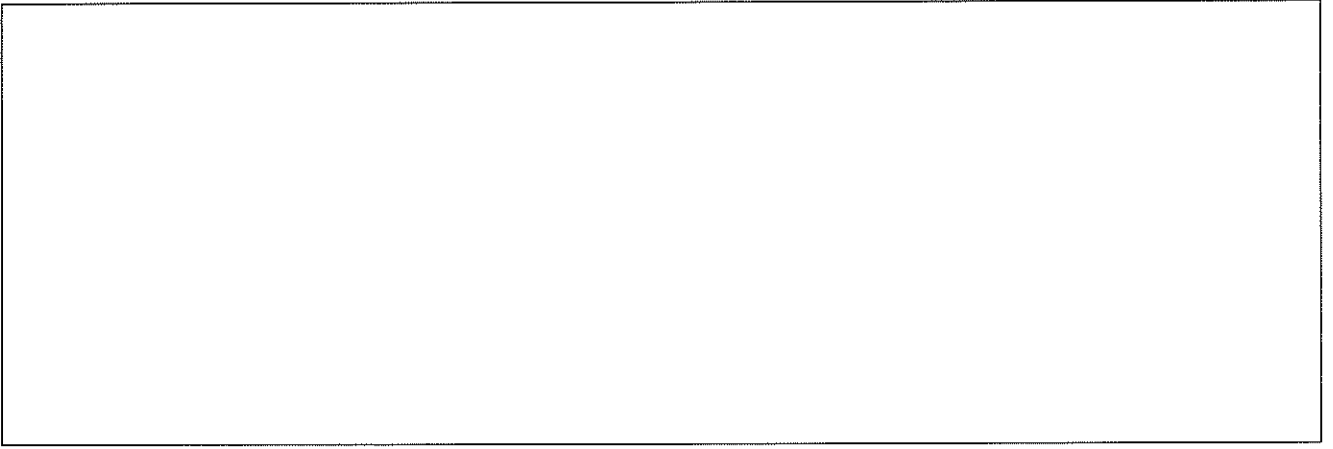


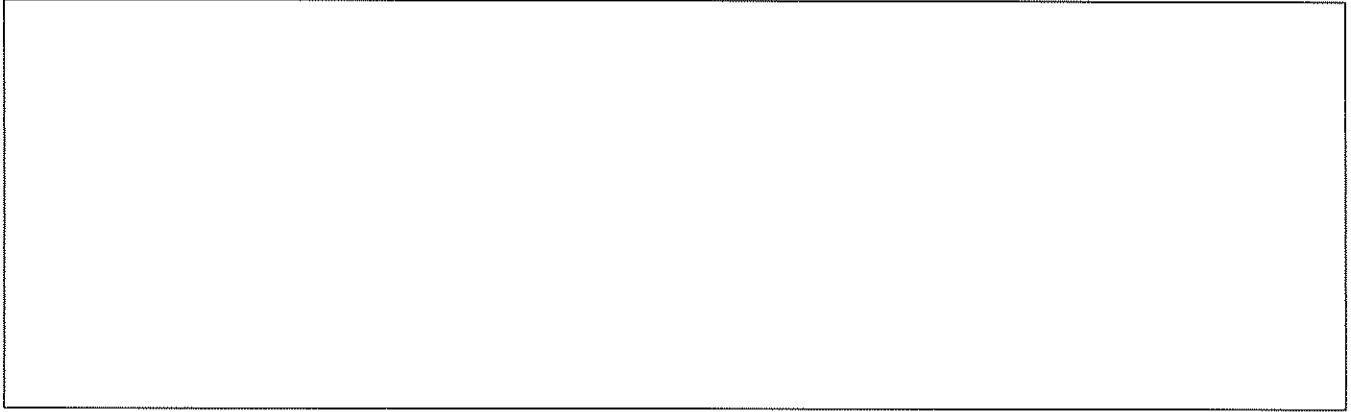


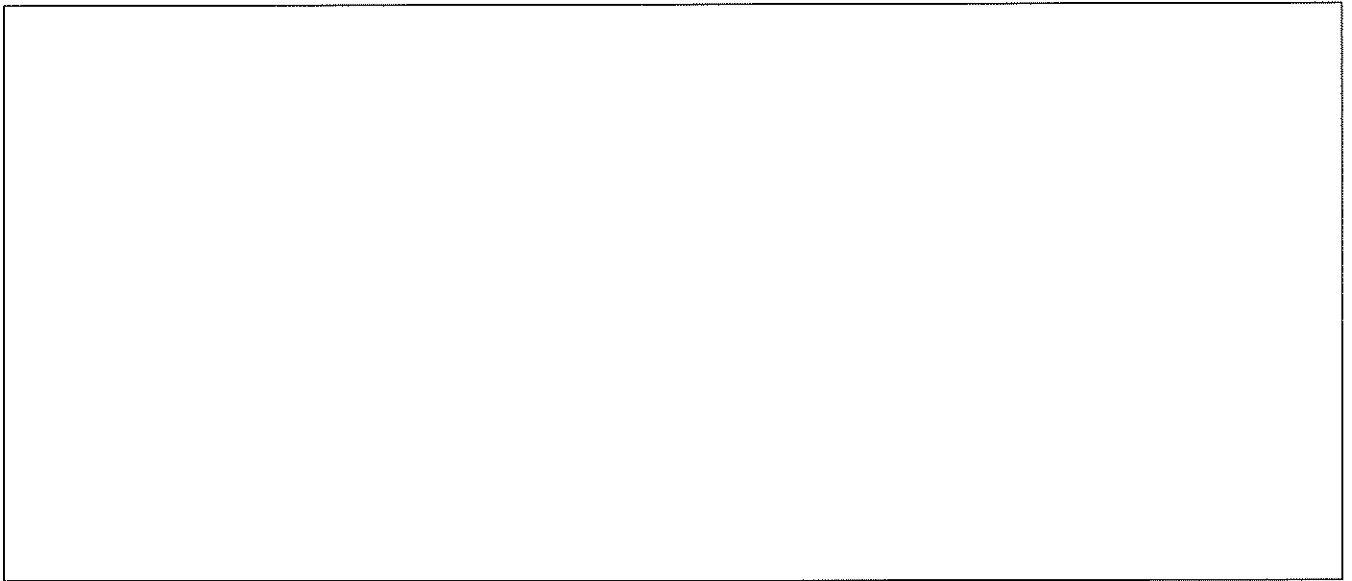














## **OFFAL PITS, FARM REFUSE DUMPS**

### **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 100m<sup>3</sup> 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

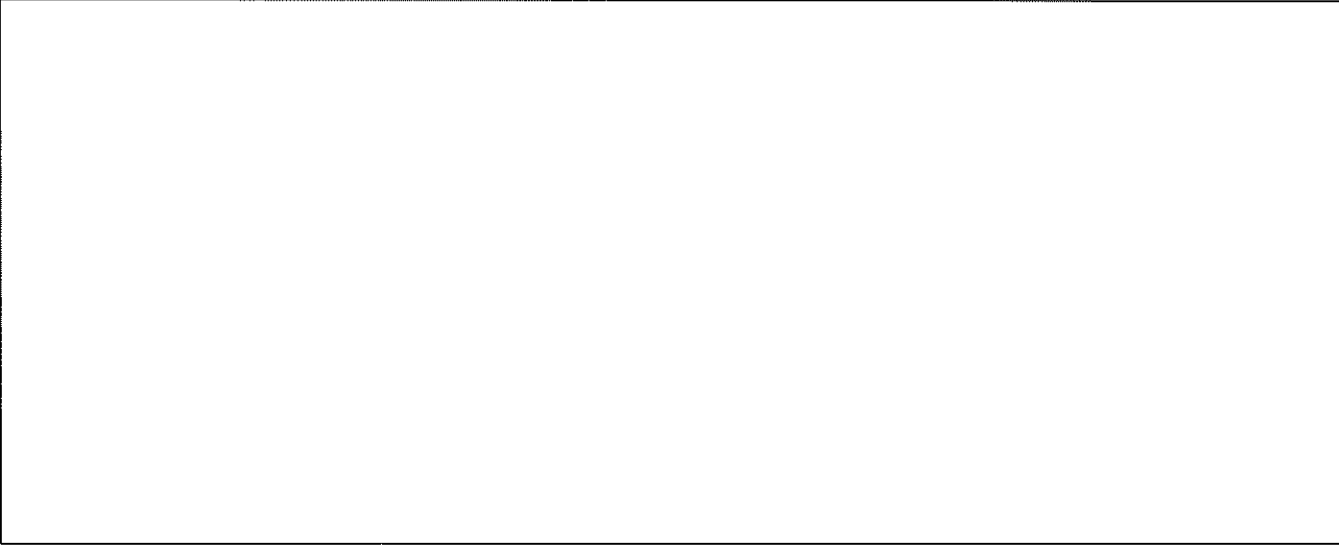
(e) no discharge within a community drinking water supply protection area

My submission is: ~~support~~/oppose

I seek the following changes:

#### **Agri-chemicals Comments and Reasons**

*This provides a level of protection that is not associated with the risk, demands undue notification requirements when neighbours might not be affected and some of spray activity is already covered in law.*



*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**



#1530017 5405

Mark Sutherland

Wellington Regional Council  
21 OCT 2015

**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](http://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





5405

**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 Stewart Booth & Eleanor Joan Booth

Organisation name: (If applicable)

Address for Service: 21a Seaview Road, Paremata, Porirua City.

Telephone no's: Work: - Home: (04) 2339665 Cell: 021 02982070

Contact person: Craig Booth or Eleanor Booth

Address and telephone no (if different from above):

**Electronic communication**

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.

Email address: grandmatoeight21@gmail.com

**Trade competition**

I/we could not gain an advantage in trade competition through this submission. [Go straight to **Your 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 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.

**Your submission**

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
Clause 5.7 Coastal Management  5.7.13 Motor vehicles on the foreshore  Rule R196: Motor vehicles - permitted activity & Rule R198: Motor vehicles inside sites of significance-non complying activity..	Reasons for my submission: →	Our understanding is that if the Proposed Natural Resources Plan is adopted in its current format / text, then the use of motor vehicles to access our property at 21a Seaview Road, Paremata, Porirua City, would be changed from a 'Restricted discretionary' activity to a 'Non-complying / Prohibited' activity, as per Rule R196 (b) and Rule R198, as our property is adjacent to the foreshore of the Pauatahanui Arm of the Porirua Harbour, referred to in Schedule F2c and Schedule F4.

		<p>Following our application in 2012, GWRC issued a Resource Consent, No WGN12016P (31575) - Category: Coastal Permit, on 31 May 2012, approving our application as a 'Restricted Discretionary Activity', allowing us to drive vehicles along the foreshore of Ivey 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.</p> <p>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.</p> <p>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 available to access our home.</p> <p>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.</p> <p>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.</p> <p>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.</p>
	<p>I seek the following decision from WRC (give precise details): →</p>	<p>To amend the wording of Rule R196 (b), as follows:</p> <p>'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'.</p> <p>To amend the wording of Rule R198, generally as per the additions to Rule R196 above.</p>

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

<p>The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):</p>	<p>My submission on this provision is: →</p>	<p><input type="checkbox"/> I <b>support</b> the provision  <input type="checkbox"/> I <b>oppose</b> the provision  <input type="checkbox"/> I wish to have the specific provision <b>amended</b></p>
	<p>Reasons for my submission: →</p>	
	<p>I seek the following decision from WRC (give precise details): →</p>	

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

<p>The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):</p>	<p>My submission on this provision is: →</p>	<p><input type="checkbox"/> I <b>support</b> the provision  <input type="checkbox"/> I <b>oppose</b> the provision  <input type="checkbox"/> I wish to have the specific provision <b>amended</b></p>
	<p>Reasons for my submission: →</p>	
	<p>I seek the following decision from WRC (give precise details): →</p>	

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: →	<input type="checkbox"/> I <b>support</b> the provision <input type="checkbox"/> I <b>oppose</b> the provision <input type="checkbox"/> I wish to have the specific provision <b>amended</b>
	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	

If you have more submissions you wish to make, please find more boxes at the bottom of this document

#### Attendance and wish to be heard at hearing(s)

- 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 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.

Signature: Craig Booth & Eleanor Booth

Date: 21 October 2015

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]

#### 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.

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: →	<input type="checkbox"/> I <b>support</b> the provision <input type="checkbox"/> I <b>oppose</b> the provision <input type="checkbox"/> I wish to have the specific provision <b>amended</b>
	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 Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: →	<input type="checkbox"/> I <b>support</b> the provision <input type="checkbox"/> I <b>oppose</b> the provision <input type="checkbox"/> I wish to have the specific provision <b>amended</b>
	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 Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: →	<input type="checkbox"/> I <b>support</b> the provision <input type="checkbox"/> I <b>oppose</b> the provision <input type="checkbox"/> I wish to have the specific provision <b>amended</b>
	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 Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: →	<input type="checkbox"/> I <b>support</b> the provision <input type="checkbox"/> I <b>oppose</b> the provision <input type="checkbox"/> I wish to have the specific provision <b>amended</b>
	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 Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: →	<input type="checkbox"/> I <b>support</b> the provision <input type="checkbox"/> I <b>oppose</b> the provision <input type="checkbox"/> I wish to have the specific provision <b>amended</b>
	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	

Proposed Natural Resources Plan:

Submitter:

**Alison Turner**

Submitter Number:

**S406**



FORM 5: SUBMISSION FORM – 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

NAME/ORGANISATION

SK06

#1529434

TURNER ALISON

NUMBER STREET NAME
110 COLOGNE STREET

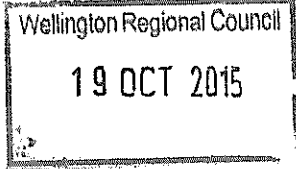
SUBURB/TOWN POSTCODE
MARTENBOROUGH 5711

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:

- My submission on this provision is:
[ ] I support the provision
[X] 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):

Please continue on separate sheet(s) in similar format or download a submission form from www.gw.govt.nz/regional-plan-review

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.

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:
Freeport 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](mailto: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](mailto: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](mailto:Regionalplan@gw.govt.nz) or post to:  
Freeport 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](mailto: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**



#153037B

**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

GREATER WELLINGTON REGIONAL COUNCIL

**Your details**

21 OCT 2015

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4.10 PM

Address for service: Leo Vollebregt

235 Pahautea Road, RD1,

Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lvoll@xtra.co.nz

**Trade competition**

**yes** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

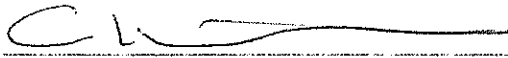
The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature: \_\_\_\_\_



Date: 20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

---

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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
Definitions	<p>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.</p>	amend	<p>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.</p>	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 A groundwater	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.		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.	
Category B groundwater (not directly connected)	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.		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 working by the river reported no adverse	
Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,			



<p>groundwater irectly onnecting to urface water egionally ignificant nfrastructure*</p>	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>groundwater irectly onnecting to urface water egionally ignificant nfrastructure*</p>	<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>amend</p>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>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</p> <p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 groundwater directly connected to surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>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) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whaitua or sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain Add (c) <u>consents will run for a period of 25 years</u></p>

	<p>(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 <i>whaitua</i> or sub-catchment.</p>		
<p>Policy P7: Uses of and water (b) and (h)</p>	<p>(b) treatment, dilution and disposal of wastewater and stormwater, and</p> <p>(h) irrigation and stock water, and</p>	<p>Amend</p> <p>support</p>	<p>Add <u>diffuse contaminants</u> to (b)</p> <p>retain</p>
<p>Policy P11: In-stream water storage</p>	<p>The benefits associated with the damming and storing of water within the bed of a river are recognised when:</p> <p>(c) there are significant social and economic benefits for the region, and</p> <p>(d) water remains available for multiple in-stream and out of stream uses concurrently, and</p> <p>(e) the reliability of water supply improves as a result, and</p> <p>(f) the damming and storage of water contributes to the</p>	<p>support</p>	<p>retain</p>

	<p>efficient allocation and use of water.</p>	<p>amend</p>	<p>Policy P107: Lapse framework for taking and using water</p>
<p>(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence</p> <p>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."</p>	<p>The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt.</p> <p>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.</p>	<p>amend</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	<p>Policy P107: Lapse framework for taking and using water</p>
	<p>We support the use of water</p>	<p>support</p>	<p>Policy P109: Lapse framework for taking and using water</p>
<p>Category A groundwater which shall be required to reduce take by 50% of the amount consented</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115(authorising</p>	<p>Amend</p>	<p>Policy P111: Water takes at minimum</p>

<p>ows and water vels )</p> <p>olicy P115: uthorising takes elow minimum lows and lake evels (d) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) <b>category A groundwater</b> which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>Amend</p> <p>oppose</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
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Policy P116: re-allocating water	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 <i>whaitua</i> chapters of the Plan (chapters 7, 8 and 10) is exceeded.	Support		Retain
Policy P117: Supplementary allocation amounts at flows above the median flow	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.	support		retain
Policy P118: Reasonable and efficient use	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	amend	The investment in infrastructure is considerable and time is required to implement changes	(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"

	operative to meet the criteria, and			
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	Support		Retain
<p>Policy P120: Taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	Support		Retain
<p>Policy P128: Transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	Support		retain

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p><u>Rules</u></p>				
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>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</p>	<p>Make this rule <u>restricted discretionary</u></p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>		



<p>id milk-cooling ater – permitted :ivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>		<p>(b) delete words after "...property." Leaving this in is anti growth and development and not in the best interests of the Waikarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>	<p>Delete Controlled and make this rule a <u>permitted</u> activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary ctivity</p>	<p>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:</p>	<p>support</p>		<p>retain</p>
<p>Other methods</p>				

Method M13: Wairarapa water races	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: <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	Support	Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.	retain
Method M19: Water management (d)	(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 <u>quantify costs and benefits of water races and explore alternatives</u>
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	support	good method esp. the use of the words "collaboration with industry"	retain

	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>tuamahanga</u> <u>Whaitua</u> Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – that are measured on aquatic ...</p>
<p><u>figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>Again the categories need <u>empirical</u> 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</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>

<p><u>chedules</u></p> <p>chedule P: assifying and anaging oundwater and urface water nnectivity</p>		<p>oppose</p>	<p>Needs <u>empirical calibration by GW</u></p> <p>The <u>connectivity</u> 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.</p>	<p><u>Needs empirical calibration by GW</u></p>
<p>chedule Q: easonable and fficient use criteria</p>	<p>Irrigation</p> <p>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:</p> <p>(a) an irrigation application efficiency of 80%, and</p> <p>(b) demand conditions that occur in nine out of 10 years.</p>	<p>Amend</p> <p>amend</p>	<p>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.</p> <p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	<p>Remove sentence <del>the model must reliably predict annual irrigation volume within an accuracy of 15%</del></p> <p>Add after field validated model – <u>for Wairarapa conditions</u></p> <p>(a) add after 80% - <u>where practicable.</u></p>

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





#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



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

GREATER WELLINGTON REGIONAL COUNCIL

21 OCT 2015

**Your details**

Full name: Leo Vollebregt  
Organisation name (if applicable): Wairarapa Water User's Inc. Society  
Address for service: Leo Vollebregt  
235 Pahautea Road, RD1,  
Featherston  
Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405  
Contact person: Leo Vollebregt  
Address and telephone no (if different from above): \_\_\_\_\_

RECEIVED

4.10 PM

**Electronic communication**

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.

Email address: lvoll@xtra.co.nz

**Trade competition**

**YES** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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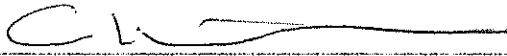
Attendance and wish to be heard at hearing(s)

**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 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.

Signature:



Date:

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought											
<u>Definitions</u> <table border="1" data-bbox="207 42 798 638"> <tr> <td data-bbox="207 42 335 638">Category A groundwater</td> <td data-bbox="207 638 335 1153">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.</td> <td data-bbox="207 1153 335 1332" rowspan="4">amend</td> <td data-bbox="207 1332 335 1915" rowspan="4"> <p>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.</p> <p>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 &amp; 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.</p> <p>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 working by the river reported no adverse</p> </td> <td data-bbox="207 1915 335 2157" rowspan="4"> <p>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</p> </td> </tr> <tr> <td data-bbox="335 42 478 638">Category B groundwater (directly connected)</td> <td data-bbox="335 638 478 1153">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.</td> </tr> <tr> <td data-bbox="478 42 662 638">Category B groundwater (not directly connected)</td> <td data-bbox="478 638 662 1153">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.</td> </tr> <tr> <td data-bbox="662 42 798 638">Category C groundwater</td> <td data-bbox="662 638 798 1153">Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.</td> </tr> </table>	Category A groundwater	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.	amend	<p>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.</p> <p>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 &amp; 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.</p> <p>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 working by the river reported no adverse</p>	<p>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</p>	Category B groundwater (directly connected)	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.	Category B groundwater (not directly connected)	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.	Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.				
Category A groundwater	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.	amend				<p>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.</p> <p>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 &amp; 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.</p> <p>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 working by the river reported no adverse</p>	<p>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</p>								
Category B groundwater (directly connected)	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.														
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Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.														

<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>regionally significant infrastructure*</p>	<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>amend</p>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>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</p> <p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water to current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 groundwater directly connected to surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <u>maximised the amount is increased</u> through time, including by means of: (a) to (e) are good means to the objective. Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain Add (c) <u>consents will run for a period of 25 years</u></p>



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

<p>Policy P107: framework for taking and using water</p>	<p>efficient allocation and use of water.</p>	<p>amend</p>	<p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have a significant part to play in establishing the evidence</u> <u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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) <b>minimum flows or water levels</b> are managed in accordance with the Plan provisions.</p>	<p>support</p>	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>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.</p> <p>The take and use of water shall not occur when flows or water levels fall below <b>minimum flows or water levels</b> in the <b>whaitua</b> chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115(authorising</p>	<p>Category A groundwater which shall be required to reduce take by 50% of the amount consented</p>

<p>flows and water levels</p> <p>)</p> <p>Policy P115: authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) <b>category A groundwater</b> which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
	<p>Amend</p> <p>oppose</p>		

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

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p><u>Rules</u></p>				
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>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</p>	<p>Make this rule <u>restricted discretionary</u></p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>		

<p>id milk-cooling ater – permitted :ivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>		<p>(b) delete words after " ... property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary ctivity</p>	<p>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:</p>	<p>support</p>		<p>retain</p>
<p><u>Other methods</u></p>				

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and <u>economic values</u> of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>



	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>tuamahanga</u> <u>Whaitua</u></p> <p>Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – that are measured on aquatic ...</p>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>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</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>

<p><u>chedules</u></p> <p><u>chedule P:</u>  assifying and  anaging  oundwater and  irface water  nnectivity</p>	<p>Needs <u>empirical calibration by GW</u></p> <p>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.</p>	<p>Needs <u>empirical calibration by GW</u></p> <p>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.</p>	<p><u>Needs empirical calibration by GW</u></p> <p>Remove sentence <del>the model must reliably predict annual irrigation volume within an accuracy of 15%</del></p> <p>Add after field validated model – <u>for Wairarapa conditions</u></p> <p>(a) add after 80% - <u>where practicable.</u></p>
<p><u>chedule Q:</u>  easonable and  fficient use criteria</p>	<p>Irrigation</p> <p>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:</p> <p>(a) an irrigation application efficiency of 80%, and</p> <p>(b) demand conditions that occur in nine out of 10 years.</p>	<p>oppose</p>	<p>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.</p> <p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>
	<p>Amend</p>	<p>Amend</p>	

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



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

1530376  
Resource Management Act 1991

**Your details**

21 OCT 2015

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4.10 PM

Address for service: Leo Vollebregt  
235 Pahautea Road, RD1,  
Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lrvoll@xtra.co.nz

**Trade competition**

**yes** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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**Attendance 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 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.

Signature: \_\_\_\_\_



Date: 20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.

Wellington Regional Council  
Wellington

21<sup>st</sup> 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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
<u>Definitions</u>	<p>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.</p>	amend	<p>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.</p>	<p>Groundwater 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</p>
<p>Category A groundwater</p>	<p>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.</p>		<p>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 &amp; 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.</p>	
<p>Category B groundwater (not directly connected)</p>	<p>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.</p>		<p>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 working by the river reported no adverse</p>	
<p>Category C groundwater</p>	<p>Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.</p>			

<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>		<p>amend</p>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>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</p> <p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 groundwater irectly connected o surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards. i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective. There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <del>maximised</del> <u>the amount is increased</u> through time, including by means of: (a) to (e) are good means to the objective. Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain Add (c) <u>consents will run for a period of 25 years</u></p>

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

	<p>efficient allocation and use of water.</p>			<p>Policy P107: Lapse dates affecting water takes</p>
<p>(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.”</p>	<p>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.</p>	<p>amend</p>		<p>Policy P109: Lapse dates affecting water takes</p>
<p>Category A groundwater which shall be required to reduce take by 50% of the amount consented</p>	<p>We support the use of water</p>	<p>support</p>	<p>Amend</p>	<p>Policy P111: Water takes at minimum flows and water levels(c) and 115(authorising</p>
				<p>Policy P111: Water takes at minimum flows and water levels in the whatia chapters (chapters 7-</p>



<p>ows and water -vels )</p> <p>olicy P115: authorising takes below minimum lows and lake evels 'd) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) <b>category A groundwater</b> which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultral root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>Amend</p> <p>oppose</p>	<p>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%.</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
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Policy P116: Reallocating water	Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by <b>existing resource consents</b> that are replaced for a lesser amount shall not be reallocated if the <b>core allocation</b> identified in Rules R.R1, WH.R1 and K.R1 in the <b>whaitua</b> chapters of the Plan (chapters 7, 8 and 10) is exceeded.	Support		Retain
Policy P117: Supplementary allocation amounts at flows above the median flow	In addition to <b>core allocation</b> , water is available from rivers at flows above the <b>median flow</b> provided <b>flushing flows</b> and a portion of flow above the <b>median flow</b> remains in the river to meet Objective O25.	support		retain
Policy P118: Reasonable and efficient use	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	amend	The investment in infrastructure is considerable and time is required to implement changes	(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made-operative <u>renewal of consent to meet the criteria</u> "

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: Taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P17 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: Transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>		
<p><u>Rules</u></p>			
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>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</p> <p>Make this rule <u>restricted discretionary</u></p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>	

<p>id milk-cooling ater – permitted ctivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>		<p>(b) delete words after "... property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary ctivity</p>	<p>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:</p>	<p>support</p>		<p>retain</p>
<p><u>Other methods</u></p>				

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and economic values of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	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??	
<p><u>Luamahanga Whaitua</u></p> <p>Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects – <u>that are measured on aquatic ...</u>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	Oppose	<p>Again the categories need <u>empirical</u> verifying. Too big an impact and too little evidence of benefit to the environment to ignore.</p> <p>As a community we need to verify categories and as this occurs the amounts in these tables may change significantly</p> <p>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.</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	Oppose		<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>





<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>Schedule R – guideline for stepdown allocations – good schedule and good use of user groups  However needs of stock drinking water and rootstock protection needs acknowledged  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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
---	--	--------------------------------	---	--

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)	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



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

654...  
RECEIVED

**Your details**

21 OCT 2015

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4.10 PM

Address for service: Leo Vollebregt

235 Pahautea Road, RD1,

Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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Email address: lrvoll@xtra.co.nz

**Trade competition**

**YES** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)


The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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**Attendance 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 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.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.

Wellington Regional Council  
Wellington

21<sup>st</sup> 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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	



**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
<u>Definitions</u>	<p>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.</p>	amend	<p>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.</p>	<p>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</p>
<p>Category A groundwater</p>	<p>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.</p>		<p>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 &amp; 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.</p>	
<p>Category B groundwater (not directly connected)</p>	<p>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.</p>		<p>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 working by the river reported no adverse</p>	
<p>Category C groundwater</p>	<p>Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.</p>			

<p>groundwater irectly onected to urface water egionally ignificant nfrastructure*</p>	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>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.</p> <ul style="list-style-type: none"> <li>• the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>		<p>amend</p>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>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</p> <p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 groundwater directly connected to surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <del>maximised</del> the amount is increased through time, including by means of:</p> <p>(a) to (e) are good means to the objective.</p> <p>Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain</p> <p>Add (c) <u>consents will run for a period of 25 years</u></p>

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

<p>Policy P107: framework for taking and using water</p>	<p>efficient allocation and use of water.</p>		<p>The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt.</p> <p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence</u></p> <p>Insert (d) when schedule P changes: <u>-ve effect on consent holders – 10 year lead in time to reflect cost, +ve effect – the water availability should be released immediately.</u></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>The framework for the take and use of water recognises:</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	<p>amend</p>	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>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.</p> <p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whatitua chapters (chapters 7-</p>	<p>support</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p>Category A groundwater which shall be required to reduce take by 50% of the amount consented</p>

<p>ows and water :vels )</p> <p>olicy P115: uthorising takes elow minimum lows and lake evels 'd) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) <b>category A groundwater</b> which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultral root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>Amend</p> <p>oppose</p>	<p>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%.</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
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<p>Policy P116: Reallocating water</p>	<p>Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by <b>existing resource consents</b> that are replaced for a lesser amount shall not be reallocated if the <b>core allocation</b> identified in Rules R.R1, WH.R1 and K.R1 in the <b>whaitua</b> chapters of the Plan (chapters 7, 8 and 10) is exceeded.</p>	<p>Support</p>		<p>Retain</p>
<p>Policy P117: Supplementary allocation amounts at flows above the median flow</p>	<p>In addition to <b>core allocation</b>, water is available from rivers at flows above the <b>median flow</b> provided <b>flushing flows</b> and a portion of flow above the <b>median flow</b> remains in the river to meet Objective O25.</p>	<p>support</p>		<p>retain</p>
<p>Policy P118: Reasonable and efficient use</p>	<p>The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of:</p> <p>(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</p>	<p>amend</p>	<p>The investment in infrastructure is considerable and time is required to implement changes</p>	<p>(a).while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made-operative <u>renewal of consent to meet the criteria</u>"</p>



	<p>operative to meet the criteria, and</p>			
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>		<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P17 is satisfied.</p>	<p>Support</p>		<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>		<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>		
<p><u>Rules</u></p>			
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>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</p> <p>Make this rule <u>restricted discretionary</u></p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>	

<p>id milk-cooling ater – permitted ctivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>(b) delete words after "...property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary ctivity</p>	<p>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:</p>	<p>support</p>	<p>retain</p>
<p>Other methods</p>			

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and <u>economic values</u> of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>Ruamahanga Whaitua</u> Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – that are measured on aquatic ...</p>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>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</p>	<p>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p>Change the allocation amounts to what is currently allocated or more if spare water has been identified</p>

<p><u>Schedule P:</u>  Reasonable and efficient use criteria</p>	<p><u>Oppose</u></p>	<p>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.</p>	<p><u>Needs empirical calibration by GW</u></p>
<p><u>Schedule Q:</u>  Reasonable and efficient use criteria</p>	<p><u>Irrigation</u>  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.</p>	<p><u>Amend</u></p> <p>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.</p> <p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	<p><u>Remove sentence the model must reliably predict annual irrigation volume within an accuracy of 15%</u>  Add after field validated model – <u>for Wairarapa conditions</u>  (a) add after 80% - <u>where practicable.</u></p>

<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>.  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.</p>	<p>Support with amendments</p>	<p>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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
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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)	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:

**Andrew Harvey**

Submitter Number:

**S411**



#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



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

GREATER WELLINGTON REGIONAL COUNCIL

**Your details**

21 OCT 2015

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4:10 PM

Address for service: Leo Vollebregt

235 Pahautea Road, RD1,

Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

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**Electronic communication**

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.

Email address: lvoll@xtra.co.nz

**Trade competition**

**yes** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature:



Date: 20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.

Wellington Regional Council  
Wellington

21<sup>st</sup> 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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
Definitions	<p>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.</p>	amend	<p>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.</p>	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 A groundwater	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.		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.	
Category B groundwater (not directly connected)	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.		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 working by the river reported no adverse	
Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.			



<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>amend</p>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>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</p> <p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 groundwater irectly connected o surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective. There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <del>maximised</del> the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain Add (c) <u>consents will run for a period of 25 years</u></p>

	<p>(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 whatua or sub-catchment.</p>			
<p>Policy P7: Uses of and water (b) and (h)</p>	<p>(b) treatment, dilution and disposal of wastewater and stormwater, and</p> <p>(h) irrigation and stock water, and</p>	<p>Amend</p> <p>support</p>	<p>(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.</p> <p>We are pleased to see irrigation get a special mention.</p> <p>retain</p>	<p>Add <u>diffuse contaminants to</u> (b)</p>
<p>Policy P11: In-stream water storage</p>	<p>The benefits associated with the damming and storing of water within the bed of a river are recognised when:</p> <p>(c) there are significant social and economic benefits for the region, and</p> <p>(d) water remains available for multiple in-stream and out of stream uses concurrently, and</p> <p>(e) the reliability of water supply improves as a result, and</p> <p>(f) the damming and storage of water contributes to the</p>	<p>support</p>		<p>retain</p>

	efficient allocation and use of water.			
<p>Policy P107: Framework for taking and using water</p>	<p>The framework for the take and use of water recognises:</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	<p>amend</p>	<p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence</u> <u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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.</p>	<p>support</p>	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the <u>whaitua</u> chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115(authorising</p>	<p><u>Category A groundwater which shall be required to reduce take by 50% of the amount consented</u></p>

<p>flows and water levels</p> <p>)</p> <p>Policy P115: authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) <b>category A groundwater</b> which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>Amend</p> <p>oppose</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
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Policy P116: re-allocating water	Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by <b>existing resource consents</b> that are replaced for a lesser amount shall not be reallocated if the <b>core allocation</b> identified in Rules R.R1, WH.R1 and K.R1 in the <b>whaitua</b> chapters of the Plan (chapters 7, 8 and 10) is exceeded.	Support	Retain
Policy P117: Supplementary allocation amounts at flows above the median flow	In addition to <b>core allocation</b> , water is available from rivers at flows above the <b>median flow</b> provided <b>flushing flows</b> and a portion of flow above the <b>median flow</b> remains in the river to meet Objective O25.	support	retain
Policy P118: Reasonable and efficient use	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 <b>existing resource consents</b> have a period of four years from the date of the plan being made	amend	(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made-operative <u>renewal of consent to meet the criteria</u>
			The investment in infrastructure is considerable and time is required to implement changes

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p><u>Rules</u></p>				
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>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</p>	<p>Make this rule <u>restricted discretionary</u></p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>		



<p>id milk-cooling ater – permitted :ivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>(b) delete words after "...property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>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</p>	<p>Delete Controlled and make this rule a <u>permitted</u> activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary activity</p>	<p>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:</p>	<p>support</p>	<p>retain</p>
<p>Other methods</p>			

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and economic values of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>Iuamahanga</u> <u>Whaitua</u> Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – that are measured on aquatic ...</p>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>Again the categories need <u>empirical</u> 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</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>

<p><u>the rules</u></p> <p>chedule P: assifying and anaging oundwater and urface water nnectivity</p>	<p>Needs <u>empirical calibration by GW</u></p> <p>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.</p>	<p>oppose</p>	<p>Needs <u>empirical calibration by GW</u></p> <p>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.</p>
<p>chedule Q: easonable and efficient use criteria</p>	<p>Irrigation</p> <p>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:</p> <p>(a) an irrigation application efficiency of 80%, and</p> <p>(b) demand conditions that occur in nine out of 10 years.</p>	<p>Amend</p> <p>amend</p>	<p>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.</p> <p>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.</p> <p>(a) add after 80% - <u>where practicable.</u></p> <p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>

<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>Schedule R – guideline for stepdown allocations – good schedule and good use of user groups  However needs of stock drinking water and rootstock protection needs acknowledged  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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
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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)	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:

**Shane Gray**

Submitter Number:

**S412**





#153037B

**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

Greater Wellington Regional Council

21 OCT 2015

**Your details**

Full name: Leo Vollebregt  
Organisation name (if applicable): Wairarapa Water User's Inc. Society  
Address for service: Leo Vollebregt  
235 Pahautea Road, RD1,  
Featherston  
Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405  
Contact person: Leo Vollebregt  
Address and telephone no (if different from above): \_\_\_\_\_

RECEIVED

4.10 PM

**Electronic communication**

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.

Email address: lrvoll@xtra.co.nz

**Trade competition**

**YES** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

---

Attendance 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 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.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

Dear Sir/Madam

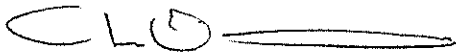
Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
Definitions				
Category A groundwater	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.	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.	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 groundwater (not directly connected)	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.		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.	
Category C groundwater	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.		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 working by the river reported no adverse	
	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,			

<p>groundwater irectly onnectd to urface water egionally ignificant nfrastructure*</p>	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>amend</p>	<p>effects to this take at low flows indicating poor relation of the takes to the river.</p> <p>There is no definition of what directly <u>connected</u> means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p><u>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</u></p> <p>Add after treatment plants ... <u>water race networks and facilities for the irrigation of pasture and crops</u></p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, <u>agricultural, industrial, cultural</u> and environmental benefits of taking and using water to current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and <u>māhinga kai</u> in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 groundwater irectly connected o surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <del>maximised</del> the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain Add (c) <u>consents will run for a period of 25 years</u></p>



	<p>(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 <i>whaitua</i> or sub-catchment.</p>		
<p>Policy P7: Uses of and water (b) and (h)</p>	<p>(b) treatment, dilution and disposal of wastewater and stormwater, and</p> <p>(h) irrigation and stock water, and</p>	<p>Amend</p> <p>support</p>	<p>(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.</p> <p>We are pleased to see irrigation get a special mention.</p> <p>retain</p> <p>retain</p>
<p>Policy P11: In-stream water storage</p>	<p>The benefits associated with the damming and storing of water within the bed of a river are recognised when:</p> <p>(c) there are significant social and economic benefits for the region, and</p> <p>(d) water remains available for multiple in-stream and out of stream uses concurrently, and</p> <p>(e) the reliability of water supply improves as a result, and</p> <p>(f) the damming and storage of water contributes to the</p>	<p>support</p>	<p>retain</p>

	<p><b>efficient allocation and use of water.</b></p>		
<p>Policy P107: framework for taking and using water</p>	<p>The framework for the take and use of water recognises:</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	<p>amend</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence</u></p> <p><u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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.</p>	<p>support</p>	<p>We support the use of water</p>
<p>Policy P111: Water takes at minimum</p>	<p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the <u>whaitua</u> chapters (chapters 7-</p>	<p>Amend</p>	<p>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</p>

<p>flows and water levels</p> <p>Policy P115: authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>.</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) <b>category A groundwater</b> which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>Amend</p> <p>oppose</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
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Policy P116: reallocating water	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 <b>whaitua</b> chapters of the Plan (chapters 7, 8 and 10) is exceeded.	Support		Retain
Policy P117: Supplementary allocation amounts at flows above the median flow	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.	support		retain
Policy P118: Reasonable and efficient use	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	amend	The investment in infrastructure is considerable and time is required to implement changes	(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"

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

			<p>Make this rule <u>restricted discretionary</u></p>
			<p>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</p>
			<p>amend</p>
<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>		<p>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.</p>	<p>amend</p>
<p>Rule R137: Farm dairy washdown</p>		<p>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</p>	<p>amend</p>
<p><u>Rules</u></p>			

<p>id milk-cooling ater – permitted ivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>		<p>(b) delete words after "... property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – controlled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary activity</p>	<p>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:</p>	<p>support</p>		<p>retain</p>
<p><u>Other methods</u></p>				

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and <u>economic values</u> of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>



	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??	
<p><u>luamahanga</u> <u>Whaitua</u></p> <p>Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – <u>that are measured on aquatic ...</u></p>
<p>Figures 7.3 – 7.8</p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>Again the categories need <u>empirical</u> 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</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p>Tables 7.3 – 7.5</p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>

<p><u>Schedule P:</u>  Reasonable and efficient use criteria</p>	<p><u>Schedule P:</u>  Reasonable and efficient use criteria</p>	<p>oppose</p>	<p>Needs <u>empirical</u> 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.</p>	<p>Needs <u>empirical</u> calibration by GW</p>
<p><u>Schedule Q:</u>  Reasonable and efficient use criteria</p>	<p><u>Schedule Q:</u>  Reasonable and efficient use criteria</p>	<p>Amend</p>	<p>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.</p>	<p>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.</p>
		<p>amend</p>	<p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	<p>Remove sentence the model must reliably predict annual irrigation volume within an accuracy of 15%  Add after field validated model – for <u>Wairarapa conditions</u>  (a) add after 80% - <u>where practicable.</u></p>

<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
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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)	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:

**Mike Warren**

Submitter Number:

**S413**





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Attendance 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 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.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

Dear Sir/Madam

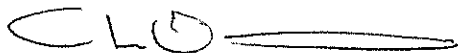
Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
<u>Definitions</u>	<p>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.</p>	amend	<p>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.</p>	<p>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</p>
<p>Category A groundwater</p>	<p>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.</p>		<p>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 &amp; 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.</p>	
<p>Category B groundwater (not directly connected)</p>	<p>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.</p>		<p>In February 2015 work undertaken in the river bed by the Wainenga 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</p>	
<p>Category C groundwater</p>	<p>Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.</p>			

<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>		<p>amend</p>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>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</p> <p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water to current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 groundwater irectly connected o surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <del>maximised</del> the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whaitua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain Add (c) <u>consents will run for a period of 25 years</u></p>

	<p>(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 sub-catchment.</p>			
<p>Policy P7: Uses of and water (b) and (h)</p>	<p>(b) treatment, dilution and disposal of wastewater and stormwater, and</p> <p>(h) irrigation and stock water, and</p>	<p>Amend</p> <p>support</p>	<p>(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.</p> <p>We are pleased to see irrigation get a special mention.</p> <p>retain</p>	<p>Add <u>diffuse contaminants to</u> (b)</p>
<p>Policy P11: In-stream water storage</p>	<p>The benefits associated with the damming and storing of water within the bed of a river are recognised when:</p> <p>(c) there are significant social and economic benefits for the region, and</p> <p>(d) water remains available for multiple in-stream and out of stream uses concurrently, and</p> <p>(e) the reliability of water supply improves as a result, and</p> <p>(f) the damming and storage of water contributes to the</p>	<p>support</p>	<p>retain</p>	

	<p>efficient allocation and use of water.</p>			
<p>Policy P107: framework for taking and using water</p>	<p>The framework for the take and use of water recognises:</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	<p>amend</p>	<p>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.</p>	<p>(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.”</p>
<p>Policy P109: Lapses affecting water takes</p>	<p>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.</p>	<p>support</p>	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whatua chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p>Category A groundwater which shall be required to reduce take by 50% of the amount consented</p>



<p>flows and water levels</p> <p>)</p> <p>Policy P115: authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) <b>category A groundwater</b> which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>Amend</p> <p>oppose</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above <b>minimum flows following a period of 10 days of continuous river levels at minimum flow</b></p> <p>As above</p> <p>Delete (c) (i)</p>
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Policy P116: re-allocating water	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 <i>whaitua</i> chapters of the Plan (chapters 7, 8 and 10) is exceeded.	Support	Retain	
Policy P117: Supplementary allocation amounts at flows above the median flow	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.	support	retain	
Policy P118: Reasonable and efficient use	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	amend	The investment in infrastructure is considerable and time is required to implement changes	(a).while existing users replacing existing resource consents have a period of 4 years from the date of the plan-being-made-operative <u>renewal of consent</u> to meet the criteria"

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: Taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: Transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p><u>Rules</u></p>			<p>amend</p>	
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>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</p>	<p>amend</p>	<p>Make this rule <u>restricted discretionary</u></p>
<p>Rule R137: Farm dairy washdown</p>	<p>The take and use of water from a <b>surface water body</b> (other than a <b>water race</b> that is permitted by Rule R138) or <b>groundwater</b> for the purpose of</p>		<p>amend</p>	

<p>id milk-cooling ater – permitted :ivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>		<p>(b) delete words after “...property.” Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – controlled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>	<p>Delete Controlled and make this rule a <u>permitted</u> activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary activity</p>	<p>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:</p>	<p>support</p>		<p>retain</p>
<p><u>Other methods</u></p>				

Method M13: Wairarapa water races	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 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  (c) 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 management (d)	(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 <u>quantify costs and benefits of water races and explore alternatives</u>
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	support	good method esp. the use of the words "collaboration with industry"	retain

	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>kuamahanga</u> <u>Whaitua</u> Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – <u>that are measured</u> on aquatic ...</p>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>Again the categories need <u>empirical</u> 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</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>

<p><u>Schedule P:</u>  Reasonable and efficient use criteria</p>	<p><u>Schedule P:</u>  Reasonable and efficient use criteria</p>	<p>oppose</p>	<p>Needs <u>empirical</u> 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.</p>	<p><u>Needs empirical calibration by GW</u></p>
<p><u>Schedule Q:</u>  Reasonable and efficient use criteria</p>	<p><u>Schedule Q:</u>  Reasonable and efficient use criteria</p>	<p>Amend</p>	<p>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.</p>	<p>Remove sentence <del>the model must reliably predict annual irrigation volume within an accuracy of 15%</del>  Add after field validated model – for <u>Wairarapa conditions</u></p> <p>(a) add after 80% - <u>where practicable.</u></p>
<p><u>Schedule Q:</u>  Reasonable and efficient use criteria</p>	<p><u>Schedule Q:</u>  Reasonable and efficient use criteria</p>	<p>amend</p>	<p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	



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

**Stephen Hammond**

Submitter Number:

**S414**



#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



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

GREATER WELLINGTON REGIONAL COUNCIL  
Resource Management

27 OCT 2015

**Your details**

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4.10 PM

Address for service: Leo Vollebregt

235 Pahautea Road, RD1,

Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lrvoll@xtra.co.nz

**Trade competition**

**yes**  **no**  **not sure**  **other**  
 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

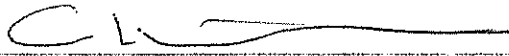
The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.

Wellington Regional Council  
Wellington

21<sup>st</sup> October 2015

Dear Sir/Madam

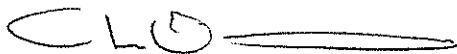
Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	



**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
Definitions				
Category A groundwater	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.	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 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
Category B groundwater (directly connected)	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.			
Category B groundwater (not directly connected)	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.			
Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,			

<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>regionally significant infrastructure*</p>	<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>amend</p>	<p>There is no definition of what directly connected means.</p>	<p>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</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>	<p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>retain</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Waitua before current water quality levels are known</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water to current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>

<p>able 3.6 groundwater directly connected to surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <del>maximised</del> the amount is increased through time, including by means of:</p> <p>(a) to (e) are good means to the objective.</p> <p>Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain</p> <p>Add (c) <u>consents will run for a period of 25 years</u></p>

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

<p>Policy P107: Framework for taking and using water</p>	<p>efficient allocation and use of water.</p>	<p>amend</p>	<p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have a significant part to play in establishing the evidence</u> <u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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) <b>minimum flows or water levels</b> are managed in accordance with the Plan provisions.</p>	<p>support</p>	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>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.</p> <p>The take and use of water shall not occur when flows or water levels fall below <b>minimum flows or water levels</b> in the <b>whaitua</b> chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p><u>Category A groundwater which shall be required to reduce take by 50% of the amount consented</u></p>

<p>flows and water levels</p> <p>)</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p>	<p>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%.</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p>
<p>Policy P115: Authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>As above</p> <p>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.</p>	<p>As above</p>
	<p>Amend</p>	<p>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</p>	<p>Delete (c) (i)</p>
	<p>oppose</p>		

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



	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p>Rules</p>				
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>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</p>	<p>Make this rule <u>restricted discretionary</u></p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>		

<p>id milk-cooling ater – permitted :ivity )</p>	<p>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</p>	<p>(b) delete words after "...property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p>
<p>Note</p>	<p>Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p>	<p>Note</p>	<p>Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p>
<p>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.</p>	<p>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.</p>	<p>amend</p>	<p>Delete <del>Controlled</del> and make this rule a <u>permitted activity</u></p>
<p>Rule R143: emporary water ermit transfers – controlled activity</p>	<p>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:</p>	<p>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</p>	<p>Delete <del>Controlled</del> and make this rule a <u>permitted activity</u></p>
<p>Rule R144: ransferring water ermits – restricted l discretionary activity</p>	<p>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:</p>	<p>support</p>	<p>retain</p>
<p><u>Other methods</u></p>			

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and <u>economic values</u> of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>Ruamahanga</u> <u>Whaitua</u> Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – that are measured on aquatic ...</p>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>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</p>	<p>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p>Change the allocation amounts to what is currently allocated or more if spare water has been identified</p>



<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>Schedule R – guideline for stepdown allocations – good schedule and good use of user groups  However needs of stock drinking water and rootstock protection needs acknowledged  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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
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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)	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**



#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



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

OFFICE OF THE  
REGIONAL COUNCIL

**Your details**

21 OCT 2015

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4.10 PM

Address for service: Leo Vollebregt  
235 Pahautea Road, RD1,  
Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lrvoll@xtra.co.nz

**Trade competition**

**yes** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

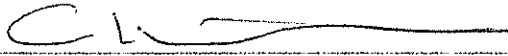
The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature:



Date:

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

Dear Sir/Madam

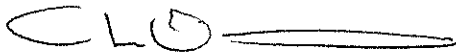
Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought								
Definitions	<table border="1"> <tr> <td data-bbox="207 56 327 224">Category A groundwater</td> <td data-bbox="207 224 327 638">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.</td> </tr> <tr> <td data-bbox="335 56 486 224">Category B groundwater (directly connected)</td> <td data-bbox="335 224 486 638">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.</td> </tr> <tr> <td data-bbox="494 56 662 224">Category B groundwater (not directly connected)</td> <td data-bbox="494 224 662 638">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.</td> </tr> <tr> <td data-bbox="670 56 790 224">Category C groundwater</td> <td data-bbox="670 224 790 638">Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,</td> </tr> </table>	Category A groundwater	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.	Category B groundwater (directly connected)	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.	Category B groundwater (not directly connected)	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.	Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,	amend	<p>The categorisation of groundwater needs clarification in the definitions.</p> <p>The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt.</p> <p>Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.</p> <p>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.</p> <p>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 &amp; 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.</p> <p>In February 2015 work undertaken in the river bed by the Wainenga 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</p>	<p>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</p>
Category A groundwater	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.											
Category B groundwater (directly connected)	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.											
Category B groundwater (not directly connected)	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.											
Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,											



groundwater directly connected to surface water regionally significant infrastructure*	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	amend	<p>effects to this take at low flows indicating poor relation of the takes to the river.</p> <p>There is no definition of what directly <u>connected</u> means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p><u>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</u></p> <p>Add after treatment plants ... <u>water race networks and facilities for the irrigation of pasture and crops</u></p>
Unused water	<p>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.</p>	support		retain
Objective O8	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	amend	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, <u>agricultural, industrial</u>, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
Objective O25 (c)	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	Oppose	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	Remove

<p>able 3.6 groundwater irectly connected o surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>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</p>	<p>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) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain Add (c) <u>consents will run for a period of 25 years</u></p>

	(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 <i>whaitua</i> or sub-catchment.			
Policy P7: Uses of and water (b) and (h)	(b) treatment, dilution and disposal of wastewater and stormwater, and  (h) irrigation and stock water, and	Amend  support	(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.	Add <u>diffuse contaminants to (b)</u>  retain
Policy P11: In-stream water storage	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	support		retain

	<p><b>efficient allocation and use of water.</b></p>		
<p>Policy P107: framework for taking and using water</p>	<p>The framework for the take and use of water recognises:</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	<p>amend</p>	<p>(a) the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence</p> <p><u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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.</p>	<p>support</p>	<p>The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt.</p> <p>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.</p>
<p>Policy P111: Water takes at minimum</p>	<p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whatitua chapters (chapters 7-</p>	<p>Amend</p>	<p><u>Category A groundwater which shall be required to reduce take by 50% of the amount consented</u></p>

<p>flows and water levels</p> <p>Policy P115: Authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below minimum flows.</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(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</p>	<p>Amend</p> <p>oppose</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
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<p>Policy P116: re-allocating water</p>	<p>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 whatua chapters of the Plan (chapters 7, 8 and 10) is exceeded.</p>	<p>Support</p>		<p>Retain</p>
<p>Policy P117: Supplementary allocation amounts at flows above the median flow</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Policy P118: Reasonable and efficient use</p>	<p>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</p>	<p>amend</p>	<p>The investment in infrastructure is considerable and time is required to implement changes</p>	<p>(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"</p>

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p><u>Rules</u></p>			<p>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</p>	<p>Make this rule <u>restricted discretionary</u></p>
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>		<p>amend</p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>			



<p>id milk-cooling ater – permitted :ivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>		<p>(b) delete words after “... property.” Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary activity</p>	<p>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:</p>	<p>support</p>		<p>retain</p>
<p><u>Other methods</u></p>				

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and <u>economic values</u> of the Wairarapa water races...</p>
<p>Method M18: Water user groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>tuamahanga</u> <u>Whaitua</u></p> <p>Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – <u>that are measured</u> on aquatic ...</p>
<p><u>figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>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</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>

<p><u>Schedule P:</u>  Reasonable and efficient use criteria</p>	<p><u>Schedule Q:</u>  Reasonable and efficient use criteria</p>	<p>oppose</p>	<p>Needs <u>empirical calibration by GW</u>  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.</p>	<p><u>Needs empirical calibration by GW</u></p>
<p><u>Schedule P:</u>  Reasonable and efficient use criteria</p>	<p>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:</p> <p>(a) an irrigation application efficiency of 80%, and  (b) demand conditions that occur in nine out of 10 years.</p>	<p>Amend</p>	<p>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.</p> <p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	<p>Remove sentence <del>the model must reliably predict annual irrigation volume within an accuracy of 15%</del>  Add after field validated model – <u>for Wairarapa conditions</u>    (a) add after 80% - <u>where practicable.</u></p>

<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
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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)	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
Tauperenikau 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**





#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



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

GREATER WELLINGTON REGIONAL COUNCIL  
RECEIVED

27 OCT 2015

**Your details**

Full name: Leo Vollebregt  
Organisation name (if applicable): Wairarapa Water User's Inc. Society  
Address for service: Leo Vollebregt  
235 Pahautea Road, RD1,  
Featherston  
Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405  
Contact person: Leo Vollebregt  
Address and telephone no (if different from above): \_\_\_\_\_

RECEIVED

4:10 PM

**Electronic communication**

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.

Email address: lvoll@xtra.co.nz

**Trade competition**

**yes** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature:



Date:

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought
<u>Definitions</u>	<p>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.</p> <p>Taking water from <b>Category A groundwater</b> is considered to be <b>surface water allocation</b>.</p>	amend	<p>The categorisation of groundwater needs clarification in the definitions.</p> <p>The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt.</p> <p>Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.</p>	<p>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</p>
<p><b>Category A groundwater</b></p>	<p>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). <b>Category B groundwater (directly connected)</b> 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.</p>		<p>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.</p> <p>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 &amp; 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.</p>	
<p><b>Category B groundwater (not directly connected)</b></p>	<p>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). <b>Category B groundwater (directly connected)</b> 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.</p>			
<p><b>Category C groundwater</b></p>	<p>Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.</p>		<p>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 working by the river reported no adverse</p>	

	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>amend</p>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>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</p> <p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 groundwater directly connected to surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) good management practice, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of:</p> <p>(a) to (e) are good means to the objective.</p> <p>Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <u>whatua</u> or <u>sub-catchment</u>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain</p> <p>Add (c) <u>consents will run for a period of 25 years</u></p>



	<p>(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 <i>whaitua</i> or sub-catchment.</p>		
<p>Policy P7: Uses of and water (b) and (h)</p>	<p>(b) treatment, dilution and disposal of wastewater and stormwater, and</p> <p>(h) irrigation and stock water, and</p>	<p>Amend</p> <p>support</p>	<p>Add <u>diffuse contaminants to</u> (b)</p> <p>retain</p>
<p>Policy P11: In-stream water storage</p>	<p>The benefits associated with the damming and storing of water within the bed of a river are recognised when:</p> <p>(c) there are significant social and economic benefits for the region, and</p> <p>(d) water remains available for multiple in-stream and out of stream uses concurrently, and</p> <p>(e) the reliability of water supply improves as a result, and</p> <p>(f) the damming and storage of water contributes to the</p>	<p>support</p>	<p>retain</p>

<p>Policy P107: Framework for taking and using water</p>	<p>efficient allocation and use of water.</p>	<p>The framework for the take and use of water recognises:</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	<p>amend</p>	<p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have a significant part to play in establishing the evidence</u> <u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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.</p>	<p>support</p>	<p>We support the use of water</p>	<p></p>	<p></p>
<p>Policy P111: Water takes at minimum</p>	<p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the <u>whaitua</u> chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p>Category A groundwater which shall be required to reduce take by 50% of the amount consented</p>	<p></p>

<p>flows and water levels</p> <p>)</p> <p>Policy P115: authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) <b>category A groundwater</b> which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>Amend</p> <p>oppose</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
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Policy P116: reallocating water	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 <b>whaitua</b> chapters of the Plan (chapters 7, 8 and 10) is exceeded.	Support		Retain
Policy P117: Supplementary allocation amounts at flows above the median flow	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.	support		retain
Policy P118: Reasonable and efficient use	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	amend	The investment in infrastructure is considerable and time is required to implement changes	(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made-operative <u>renewal of consent to meet the criteria</u> "

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>		
<p><u>Rules</u></p>			
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>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</p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>	<p>Make this rule <u>restricted discretionary</u></p>

<p>id milk-cooling ater – permitted :ivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>		<p>(b) delete words after "...property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – controlled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary :ivity</p>	<p>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:</p>	<p>support</p>		<p>retain</p>
<p>Other methods</p>				

Method M13: Wairarapa water races	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 (b) 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, 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 management (d)	(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 <u>quantify costs and benefits of water races and explore alternatives</u>
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	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>Ruamahanga Whaitua</u> Policy 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 on aquatic ...</u>
<u>Figures 7.3 – 7.8</u>	Water allocation amounts	Oppose	Again the categories need <u>empirical</u> 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	<u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u>
<u>Tables 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.	<u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u>

<p><u>Schedules</u></p> <p>Schedule P:  assessing and  managing  groundwater and  surface water  connectivity</p>		<p>oppose</p>	<p>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.</p>	<p><u>Needs empirical calibration by GW</u></p>
<p>Schedule Q:  reasonable and  efficient use criteria</p>	<p>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.</p>	<p>Amend</p>	<p>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.</p> <p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	<p>Remove sentence <del>the model must reliably predict annual irrigation volume within an accuracy of 15%</del></p> <p>Add after field validated model – <u>for Wairarapa conditions</u></p> <p>(a) add after 80% - <u>where practicable.</u></p>

<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>Schedule R – guideline for stepdown allocations – good schedule and good use of user groups  However needs of stock drinking water and rootstock protection needs acknowledged  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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
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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)	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:

**Matthew Honeysett**

Submitter Number:

**S417**



#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



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

688 Tamaki Drive  
Bassett, Wellington

27 OCT 2015

**Your details**

Full name: Leo Vollebregt  
Organisation name (if applicable): Wairarapa Water User's Inc. Society  
Address for service: Leo Vollebregt  
235 Pahautea Road, RD1,  
Featherston  
Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405  
Contact person: Leo Vollebregt  
Address and telephone no (if different from above): \_\_\_\_\_

RECEIVED

4.10 PM

**Electronic communication**

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.

Email address: lvoll@xtra.co.nz

**Trade competition**

**yes** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature:



Date: 20/10/2015

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought											
<u>Definitions</u> <table border="1" data-bbox="207 44 798 2154"> <tr> <td data-bbox="207 44 335 224">Category A groundwater</td> <td data-bbox="207 224 335 627">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.</td> <td data-bbox="207 627 335 1008" rowspan="4">amend</td> <td data-bbox="207 1008 335 1456" rowspan="4">The categorisation of groundwater needs 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.</td> <td data-bbox="207 1456 335 2154" rowspan="4">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</td> </tr> <tr> <td data-bbox="335 44 478 224">Category B groundwater (directly connected)</td> <td data-bbox="335 224 478 627">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.</td> </tr> <tr> <td data-bbox="478 44 670 224">Category B groundwater (not directly connected)</td> <td data-bbox="478 224 670 627">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 (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.</td> </tr> <tr> <td data-bbox="670 44 798 224">Category C groundwater</td> <td data-bbox="670 224 798 627">Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.</td> </tr> </table>	Category A groundwater	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.	amend	The categorisation of groundwater needs 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.	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 groundwater (directly connected)	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.	Category B groundwater (not directly connected)	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 (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.	Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.				
Category A groundwater	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.	amend				The categorisation of groundwater needs 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.	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								
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Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.														

<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>		<p>amend</p>	<p>There is no definition of what directly connected means.</p>	<p>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</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>	<p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>retain</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>

<p>able 3.6 groundwater directly connected to surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) good management practice, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective. There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <del>maximised</del> <u>the amount is increased</u> through time, including by means of: (a) to (e) are good means to the objective. Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <u>whatua</u> or <u>sub-catchment</u>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain Add (c) <u>consents will run for a period of 25 years</u></p>

	<p>(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 <i>whaitua</i> or sub-catchment.</p>		
<p>Policy P7: Uses of and water (b) and (h)</p>	<p>(b) treatment, dilution and disposal of wastewater and stormwater, and</p> <p>(h) irrigation and stock water, and</p>	<p>Amend</p> <p>support</p>	<p>Add <u>diffuse contaminants to</u> (b)</p> <p>retain</p>
<p>Policy P11: In-stream water storage</p>	<p>The benefits associated with the damming and storing of water within the bed of a river are recognised when:</p> <p>(c) there are significant social and economic benefits for the region, and</p> <p>(d) water remains available for multiple in-stream and out of stream uses concurrently, and</p> <p>(e) the reliability of water supply improves as a result, and</p> <p>(f) the damming and storage of water contributes to the</p>	<p>support</p>	<p>retain</p>

<p>Policy P107: Framework for taking and using water</p>	<p>efficient allocation and use of water.</p>	<p>amend</p>	<p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have a significant part to play in establishing the evidence</u> <u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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) <b>minimum flows or water levels</b> are managed in accordance with the Plan provisions.</p>	<p>support</p>	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>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.</p> <p>The take and use of water shall not occur when flows or water levels fall below <b>minimum flows or water levels</b> in the <b>whaitua</b> chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p><u>Category A groundwater which shall be required to reduce take by 50% of the amount consented</u></p>



<p>flows and water levels</p> <p>)</p> <p>Policy P115: authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) <b>category A groundwater</b> which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>Amend</p> <p>oppose</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at <b>minimum flow</b></p> <p>As above</p> <p>Delete (c) (i)</p>
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Policy P116: Reallocating water	Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by <b>existing resource consents</b> that are replaced for a lesser amount shall not be reallocated if the <b>core allocation</b> identified in Rules R.R1, WH.R1 and K.R1 in the <b>whaitua</b> chapters of the Plan (chapters 7, 8 and 10) is exceeded.	Support	Retain	
Policy P117: Supplementary allocation amounts at flows above the median flow	In addition to <b>core allocation</b> , water is available from rivers at flows above the <b>median flow</b> provided <b>flushing flows</b> and a portion of flow above the <b>median flow</b> remains in the river to meet Objective O25.	support	retain	
Policy P118: Reasonable and efficient use	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 <b>existing resource consents</b> have a period of four years from the date of the plan being made	amend	The investment in infrastructure is considerable and time is required to implement changes	(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made-operative <u>renewal of consent to meet the criteria</u>

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>		
<p><b>Rules</b></p>			
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>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</p> <p>Make this rule <u>restricted discretionary</u></p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>	

<p>id milk-cooling ater – permitted stivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>		<p>(b) delete words after "... property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscrctionary ctivity</p>	<p>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:</p>	<p>support</p>		<p>retain</p>
<p>Other methods</p>				

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and economic values of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>kuamahanga</u> <u>Whaitua</u> Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects -- that are measured on aquatic ...</p>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>Again the categories need <u>empirical</u> 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</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>





<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>Schedule R – guideline for stepdown allocations – good schedule and good use of user groups  However needs of stock drinking water and rootstock protection needs acknowledged  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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
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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)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatare 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



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

683-1111 Wellington  
845-1111 Wellington

**Your details**

21 OCT 2015

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4.10 PM

Address for service: Leo Vollebregt

235 Pahautea Road, RD1,

Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lrvoll@xtra.co.nz

**Trade competition**

**YES** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

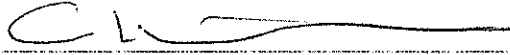
The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature:



Date:

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.

Wellington Regional Council  
Wellington

21<sup>st</sup> 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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	



**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

<u>Provision</u>	<u>Text</u>	<u>Support/ Oppose/ Amend</u>	<u>Reasons</u>	<u>Relief sought</u>
<u>Definitions</u>	<p>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 <b>Category A groundwater</b> is considered to be <b>surface water allocation</b>.</p> <p>Groundwater not classified as either <b>category A groundwater</b> or <b>category C groundwater</b> and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). <b>Category B groundwater (directly connected)</b> 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 <b>category B groundwater (directly connected)</b> is considered to be <b>surface water allocation</b>.</p> <p>Groundwater not classified as either <b>category A groundwater</b> or <b>category C groundwater</b> and which is defined as being not directly connected to surface water through applying the tests in Schedule Q (efficient use). <b>Category B groundwater (not directly connected)</b> 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 <b>category B groundwater (not directly connected)</b> is considered to be groundwater allocation.</p> <p>Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,</p>	<p>amend</p>	<p>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.</p> <p>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 &amp; 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.</p> <p>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 working by the river reported no adverse</p>	<p>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</p>

	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>amend</p>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>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</p> <p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 roundwater irectly connected o surface water</p>	<p>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</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>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</p>	<p>the efficiency of allocation and use of water is improved and <u>maximised the amount is increased</u> through time, including by means of: (a) to (e) are good means to the objective.  Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain  Add (c) <u>consents will run for a period of 25 years</u></p>

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

<p>Policy P107: Framework for taking and using water</p>	<p>efficient allocation and use of water.</p>	<p>amend</p>	<p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence</u> <u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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) <b>minimum flows or water levels</b> are managed in accordance with the Plan provisions.</p>	<p>support</p>	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>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.</p> <p>The take and use of water shall not occur when flows or water levels fall below <b>minimum flows or water levels</b> in the <b>whaitua</b> chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p>Category A groundwater which shall be required to reduce take by 50% of the amount consented</p>

<p>flows and water levels )</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:  (c) as authorised by resource consents in accordance with Policy P108.</p>	<p>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%.</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p>
<p>Policy P115: Authorising takes below minimum flows and lake levels (d) and (c) i</p>	<p>(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p>	<p>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.</p>	<p>As above</p>
<p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p>	<p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>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</p>	<p>Delete (c) (i)</p>

Policy P116: reallocating water	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 <b>whaitua</b> chapters of the Plan (chapters 7, 8 and 10) is exceeded.	Support		Retain
Policy P117: Supplementary allocation amounts at flows above the median flow	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.	support		retain
Policy P118: Reasonable and efficient use	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	amend	The investment in infrastructure is considerable and time is required to implement changes	(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"



	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>		
<p><b>Rules</b></p>			
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>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</p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>	<p>Make this rule <u>restricted discretionary</u></p>

<p>id milk-cooling ater – permitted ctivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>(b) delete words after "... property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>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</p>	<p>Delete Controlled and make this rule a <u>permitted</u> activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary ctivity</p>	<p>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:</p>	<p>support</p>	<p>retain</p>
<p><u>Other methods</u></p>			

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and <u>economic values</u> of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	<p>implementation of policies which rely on <b>good management practice</b> to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>tuamahanga Whaitua</u></p> <p>Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>When allocating river water or groundwater <b>directly connected to surface water</b>, 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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>insert after - adverse effects – <u>that are measured</u> on aquatic ...</p>
<p><u>figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>Again the categories need <u>empirical</u> 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</p> <p>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.</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>		<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>

<p><u>chedules</u></p> <p>chedule P: assifying and anging oundwater and irface water nnectivity</p>		<p>oppose</p>	<p>Needs <u>empirical calibration by GW</u></p> <p>The <u>connectivity</u> between various ground water takes and surface water has not been verified and amongst the users there is significant doubt.</p> <p>Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.</p>	<p><u>Needs empirical calibration by GW</u></p>
<p>chedule Q: easonable and fficient use criteria</p>	<p>Irrigation</p> <p>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:</p> <p>(a) an irrigation application efficiency of 80%, and</p> <p>(b) demand conditions that occur in nine out of 10 years.</p>	<p>Amend</p>	<p>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.</p> <p>Wairarapa conditions differ from the rest of the country. This needs to be recognised.</p> <p>More consultation with affected parties is required.</p> <p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	<p>Remove sentence <del>the model must reliably predict annual irrigation volume within an accuracy of 15%</del></p> <p>Add after field validated model -- <u>for Wairarapa conditions</u></p> <p>(a) add after 80% - <u>where practicable.</u></p>

<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
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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)	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:

**David Holmes**

Submitter Number:

**S419**



#1530378

**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

GREATER WELLINGTON REGIONAL COUNCIL

21 OCT 2015

**Your details**

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4.10 PM

Address for service: Leo Vollebregt

235 Pahautea Road, RD1,

Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lvoll@xtra.co.nz

**Trade competition**

**yes** 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')

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

<u>Provision</u>	<u>Text</u>	<u>Support/ Oppose/ Amend</u>	<u>Reasons</u>	<u>Relief sought</u>
<u>Definitions</u>	<p>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.</p>	amend	<p>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.</p>	<p>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</p>
<p>Category A groundwater</p>	<p>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.</p>		<p>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 &amp; 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.</p>	
<p>Category B groundwater (not directly connected)</p>	<p>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.</p>		<p>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 working by the river reported no adverse</p>	
<p>Category C groundwater</p>	<p>Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.</p>			



<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>		<p>amend</p>	<p>There is no definition of what directly <u>connected</u> means.</p>	<p><u>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</u></p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>	<p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>Add after treatment plants ... <u>water race networks and facilities for the irrigation of pasture and crops</u></p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>retain</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>the social, <u>agricultural, industrial, cultural</u> and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>

<p>able 3.6 groundwater directly connected to surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of:</p> <p>(a) to (e) are good means to the objective.</p> <p>Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whaitua or sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain</p> <p>Add (c) <u>consents will run for a period of 25 years</u></p>

	(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 <b>whaitua</b> or sub-catchment.				
Policy P7: Uses of and water (b) and (h)	(b) treatment, dilution and disposal of <b>wastewater</b> and <b>stormwater</b> , and  (h) irrigation and stock water, and	Amend	(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.	Add <u>diffuse contaminants</u> to (b)	retain
Policy P11: In-stream water storage	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	support			retain

<p>Policy P107: Framework for taking and using water</p>	<p>efficient allocation and use of water.</p>	<p>amend</p>	<p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence</u> <u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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) <b>minimum flows or water levels</b> are managed in accordance with the Plan provisions.</p>	<p>support</p>	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>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.</p> <p>The take and use of water shall not occur when flows or water levels fall below <b>minimum flows or water levels</b> in the <b>whaitua</b> chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p>Category A groundwater which shall be required to reduce take by 50% of the amount consented</p>

<p>flows and water levels</p> <p>Policy P115: authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below minimum flows:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(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</p>	<p>takes below minimum flows and lake levels)(c) 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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
	<p>Amend</p> <p>oppose</p>		

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

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>	
<p><u>Rules</u></p>		
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>
	<p>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</p>	<p>Make this rule <u>restricted discretionary</u></p>



<p>id milk-cooling ater – permitted ctivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>		<p>(b) delete words after "... property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary ctivity</p>	<p>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:</p>	<p>support</p>		<p>retain</p>
<p><u>Other methods</u></p>				

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and <u>economic values</u> of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>kuamahanga</u> <u>Whaitua</u></p> <p>Policy R.P3: Cumulative effects of river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – <u>that are measured</u> on aquatic ...</p>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>Again the categories need <u>empirical</u> 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</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>

<p><u>schedule P:</u>  assessing and  managing  groundwater and  surface water  connectivity</p>		oppose	<p>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.</p>	<p><u>Needs empirical calibration by GW</u></p>
<p><u>schedule Q:</u>  reasonable and  efficient use criteria</p>	<p>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:</p> <p>(a) an irrigation application efficiency of 80%, and  (b) demand conditions that occur in nine out of 10 years.</p>	Amend	<p>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.</p> <p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	<p>Remove sentence <del>the model must reliably predict annual irrigation volume within an accuracy of 15%</del>  Add after field validated model -- <u>for Wairarapa conditions</u>    (a) add after 80% - <u>where practicable.</u></p>

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

Submitter Number:

**S420**





#1530378

**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

GREATER WELLINGTON REGIONAL COUNCIL

21 OCT 2015

**Your details**

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4.10 PM

Address for service: Leo Vollebregt

235 Pahautea Road, RD1,

Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lvoll@xtra.co.nz

**Trade competition**

**yes** 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')

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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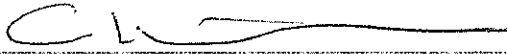
Attendance and wish to be heard at hearing(s)

**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 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.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought											
<u>Definitions</u> <table border="1" data-bbox="207 44 782 2157"> <tr> <td data-bbox="207 44 335 224">Category A groundwater</td> <td data-bbox="207 224 335 627">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.</td> <td data-bbox="207 627 335 1008" rowspan="4">amend</td> <td data-bbox="207 1008 335 1456" rowspan="4">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.</td> <td data-bbox="207 1456 335 2157" rowspan="4">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</td> </tr> <tr> <td data-bbox="335 44 462 224">Category B groundwater (directly connected)</td> <td data-bbox="335 224 462 627">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.</td> </tr> <tr> <td data-bbox="462 44 590 224">Category B groundwater (not directly connected)</td> <td data-bbox="462 224 590 627">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.</td> </tr> <tr> <td data-bbox="590 44 782 224">Category C groundwater</td> <td data-bbox="590 224 782 627">Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.</td> </tr> </table>	Category A groundwater	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.	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.	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 groundwater (directly connected)	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.	Category B groundwater (not directly connected)	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.	Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.				
Category A groundwater	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.	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.	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								
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Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7.														

groundwater directly connected to surface water	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
regionally significant infrastructure*		amend	<p>There is no definition of what directly <u>connected</u> means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p><u>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</u></p> <p>Add after treatment plants ... <u>water race networks and facilities for the irrigation of pasture and crops</u></p>
Unused water	<p>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.</p>	support		retain
Objective O8	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	amend	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
Objective O25 (c)	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	Oppose	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	Remove

<p>able 3.6 groundwater directly connected to surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <del>maximised</del> the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain Add (c) <u>consents will run for a period of 25 years</u></p>



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

<p>Policy P107: Framework for taking and using water</p>	<p>efficient allocation and use of water.</p>	<p>amend</p>	<p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have a significant part to play in establishing the evidence</u> <u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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.</p>	<p>support</p>	<p>We support the use of water</p>	<p>Category A groundwater which shall be required to reduce take by 50% of the amount consented</p>
<p>Policy P111: Water takes at minimum</p>	<p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the <u>whaitua</u> chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p></p>

<p>flows and water levels</p> <p>Policy P115: Authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p><u>above minimum flows following a period of 10 days of continuous river levels at minimum flow</u></p> <p>As above</p> <p>Delete (c) (i)</p>
	<p>Amend</p> <p>oppose</p>		

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

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p><u>Rules</u></p>			<p>amend</p>	<p>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</p>
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>Make this rule <u>restricted discretionary</u></p>	
<p>Rule R137: Farm dairy washdown</p>	<p>The take and use of water from a <b>surface water body</b> (other than a <b>water race</b> that is permitted by Rule R138) or groundwater for the purpose of</p>	<p>amend</p>		

<p>id milk-cooling ater – permitted ctivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>		<p>(b) delete words after "... property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>amend</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary ctivity</p>	<p>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:</p>	<p>support</p>		<p>retain</p>
<p><u>Other methods</u></p>				

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and <u>economic values</u> of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>



	<p>implementation of policies which rely on <b>good management practice</b> to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>tuamahanga</u> <u>Whaitua</u> Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>When allocating river water or groundwater <b>directly connected to surface water</b>, 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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects -- that are measured on aquatic ...</p>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>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</p> <p>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.</p>	<p>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>		<p>Change the allocation amounts to what is currently allocated or more if spare water has been identified</p>

<p><u>Schedule P:</u>  Reasonable and efficient use criteria</p>	<p><u>irrigation</u>  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:</p> <p>(a) an irrigation application efficiency of 80%, and</p> <p>(b) demand conditions that occur in nine out of 10 years.</p>	<p>oppose</p>	<p>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.</p>	<p><u>Needs empirical calibration by GW</u></p>
<p><u>Schedule Q:</u>  Reasonable and efficient use criteria</p>	<p><u>irrigation</u>  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:</p> <p>(a) an irrigation application efficiency of 80%, and</p> <p>(b) demand conditions that occur in nine out of 10 years.</p>	<p>Amend</p>	<p>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.</p> <p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	<p><del>Remove sentence the model must reliably predict annual irrigation volume within an accuracy of 15%</del>  Add after field validated model -- <u>for Wairarapa conditions</u>  (a) add after 80% - <u>where practicable.</u></p>

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



#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



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

1683-1000 Wellington  
Regional Council

**Your details**

21 OCT 2015

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4:10 PM

Address for service: Leo Vollebregt

235 Pahautea Road, RD1,

Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lrvoll@xtra.co.nz

**Trade competition**

<sup>yes</sup> 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')

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

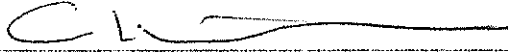
The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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**Attendance 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 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.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

Provision	Text	Support/ Oppose/ Amend	Reasons	Relief sought							
<u>Definitions</u> <table border="1" data-bbox="191 47 319 2163"> <tr> <td data-bbox="191 47 239 224">Category A groundwater</td> <td data-bbox="191 224 319 627">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.</td> </tr> <tr> <td data-bbox="191 627 239 784">Category B groundwater (directly connected)</td> <td data-bbox="191 784 319 1008">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.</td> </tr> <tr> <td data-bbox="191 1008 239 1232">Category B groundwater (not directly connected)</td> <td data-bbox="191 1232 319 1456">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.</td> </tr> <tr> <td data-bbox="191 1456 239 2163">Category C groundwater</td> <td data-bbox="191 1456 319 2163">Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,</td> </tr> </table>	Category A groundwater	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.	Category B groundwater (directly connected)	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.	Category B groundwater (not directly connected)	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.	Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,	amend	<p>The categorisation of groundwater needs clarification in the definitions.</p> <p>The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt.</p> <p>Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.</p> <p>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.</p> <p>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 &amp; 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.</p> <p>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 working by the river reported no adverse</p>	<p>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</p>
Category A groundwater	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.										
Category B groundwater (directly connected)	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.										
Category B groundwater (not directly connected)	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.										
Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,										

<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>regionally significant infrastructure*</p>	<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>amend</p>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>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</p> <p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

	<p><b>efficient allocation and use of water.</b></p>		
<p>Policy P107: Framework for taking and using water</p>	<p>The framework for the take and use of water recognises:</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	<p>amend</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence</u></p> <p><u>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></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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.</p>	<p>support</p>	<p>The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt.</p> <p>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.</p>
<p>Policy P111: Water takes at minimum</p>	<p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the <u>whaitua</u> chapters (chapters 7-</p>	<p>Amend</p>	<p><u>Category A groundwater which shall be required to reduce take by 50% of the amount consented</u></p>

<p>flows and water levels</p> <p>)</p> <p>Policy P115: Authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below minimum flows:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after minimum flow cessation restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>Amend</p> <p>oppose</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
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<p>Policy P116: re-allocating water</p>	<p>Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by <b>existing resource consents</b> that are replaced for a lesser amount shall not be reallocated if the <b>core allocation</b> identified in Rules R.R1, WH.R1 and K.R1 in the <b>whaitua</b> chapters of the Plan (chapters 7, 8 and 10) is exceeded.</p>	<p>Support</p>	<p>Retain</p>	<p></p>
<p>Policy P117: Supplementary allocation amounts at flows above the median flow</p>	<p>In addition to <b>core allocation</b>, water is available from rivers at flows above the <b>median flow</b> provided <b>flushing flows</b> and a portion of flow above the <b>median flow</b> remains in the river to meet Objective O25.</p>	<p>support</p>	<p>retain</p>	<p></p>
<p>Policy P118: Reasonable and efficient use</p>	<p>The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of:</p> <p>(a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing <b>existing resource consents</b> have a period of four years from the date of the plan being made</p>	<p>amend</p>	<p>The investment in infrastructure is considerable and time is required to implement changes</p>	<p>(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made-operative <u>renewal of consent to meet the criteria</u></p>



	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: Taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: Transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p><u>Rules</u></p> <p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p> <p>Rule R137: Farm dairy washdown</p>		<p>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</p>	<p>amend</p>	<p>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.</p> <p>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</p> <p>amend</p>

Make this rule restricted discretionary

<p>id milk-cooling ater – permitted :tivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p>	<p>(b) delete words after "...property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p>
<p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary ctivity</p>	<p>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:</p>	<p>support</p>	<p>retain</p>
<p><u>Other methods</u></p>			

Method M13: Wairarapa water races	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 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  (c) 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 management (d)	(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 <u>quantify costs and benefits of water races and explore alternatives</u>
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	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??	
<p><u>tuamahanga</u> <u>Mhaitua</u></p> <p>Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – that are measured on aquatic ...</p>
<p>Figures 7.3 – 7.8</p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>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</p>	<p>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</p>
<p>Tables 7.3 – 7.5</p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p>Change the allocation amounts to what is currently allocated or more if spare water has been identified</p>

<p><u>Schedules</u></p> <p>Schedule P: assessing and managing groundwater and surface water connectivity</p>	<p>oppose</p>	<p>Needs <u>empirical</u> 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.</p>	<p>Needs <u>empirical</u> calibration by GW</p>
<p>Schedule Q: reasonable and efficient use criteria</p>	<p>Amend</p>	<p>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.</p>	<p>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.</p> <p>(a) add after 80% - <u>where practicable</u>.</p>
	<p>amend</p>	<p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	

<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>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. GWV 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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GWV to consult with water users</p>
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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)	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:

**Shaun Rose**

Submitter Number:

**S422**



#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



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

GREATER WELLINGTON REGIONAL COUNCIL

**Your details**

27 OCT 2015

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4:10 PM

Address for service: Leo Vollebregt

235 Pahautea Road, RD1,

Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lvoll@xtra.co.nz

**Trade competition**

**yes**  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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature:



Date: 20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

<u>Provision</u>	<u>Text</u>	<u>Support/ Oppose/ Amend</u>	<u>Reasons</u>	<u>Relief sought</u>							
<u>Definitions</u> <table border="1" data-bbox="207 56 798 224"> <tr> <td data-bbox="207 56 319 224">Category A groundwater</td> <td data-bbox="207 224 319 627">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.</td> </tr> <tr> <td data-bbox="207 627 319 1008">Category B groundwater (directly connected)</td> <td data-bbox="207 1008 319 1456">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.</td> </tr> <tr> <td data-bbox="207 1456 319 1792">Category B groundwater (not directly connected)</td> <td data-bbox="207 1792 319 1904">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.</td> </tr> <tr> <td data-bbox="207 1904 319 2161">Category C groundwater</td> <td data-bbox="207 2161 319 2161">Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,</td> </tr> </table>	Category A groundwater	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.	Category B groundwater (directly connected)	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.	Category B groundwater (not directly connected)	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.	Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,	amend	<p>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.</p> <p>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 &amp; 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.</p> <p>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 working by the river reported no adverse</p>	<p>Groundwater 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</p>
Category A groundwater	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.										
Category B groundwater (directly connected)	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.										
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Category C groundwater	Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,										



<p>Groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p>	<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	<p>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</p>
<p>Groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>retain</p>	<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 groundwater directly connected to surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) good management practice, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <del>maximised</del> the amount is increased through time, including by means of:</p> <p>(a) to (e) are good means to the objective.</p> <p>Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <u>whatua</u> or <u>sub-catchment</u>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain</p> <p>Add (c) <u>consents will run for a period of 25 years</u></p>

	(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 <b>whaitua</b> or sub-catchment.			
Policy P7: Uses of and water (b) and (h)	(b) treatment, dilution and disposal of <b>wastewater</b> and <b>stormwater</b> , and  (h) irrigation and stock water, and	Amend  support	(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.	Add <u>diffuse contaminants to</u> (b)  retain
Policy P11: In-stream water storage	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	support		retain

	<p>efficient allocation and use of water.</p>		
<p>Policy P107: Framework for taking and using water</p>	<p>The framework for the take and use of water recognises:</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	<p>amend</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have a significant part to play in establishing the evidence</u></p> <p>Insert (d) when schedule P changes: <u>-ve effect on consent holders – 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately.</u>"</p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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.</p>	<p>support</p>	<p>The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt.</p> <p>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.</p> <p>We support the use of water</p>
<p>Policy P111: Water takes at minimum</p>	<p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whatua chapters (chapters 7-</p>	<p>Amend</p>	<p><u>Category A groundwater which shall be required to reduce take by 50% of the amount consented</u></p>

<p>flows and water levels</p> <p>Policy P115: authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
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Policy P116: Reallocating water	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 <i>whaitua</i> chapters of the Plan (chapters 7, 8 and 10) is exceeded.	Support		Retain
Policy P117: Supplementary allocation amounts at flows above the median flow	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.	support		retain
Policy P118: Reasonable and efficient use	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	amend	The investment in infrastructure is considerable and time is required to implement changes	(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made-operative <u>renewal of consent to meet the criteria</u>

	<p>operative to meet the criteria, and</p>		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	<p>Support</p>	<p>Retain</p>
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	<p>Support</p>	<p>Retain</p>
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	<p>Support</p>	<p>retain</p>

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p><u>Rules</u></p> <p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p> <p>Rule R137: Farm dairy washdown</p>		<p>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</p>	<p>amend</p>	<p>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.</p> <p>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</p> <p>amend</p>

Make this rule restricted discretionary



<p>id milk-cooling ater – permitted :ivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>(b) delete words after "...property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>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</p>	<p>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</p>	<p>amend</p>	<p>amend</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary activity</p>	<p>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:</p>	<p>retain</p>	<p>retain</p>	<p>support</p>	<p>support</p>	<p>retain</p>
<p>Other methods</p>						

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and economic values of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>Tuamahanga Whaitua</u> Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – that are measured on aquatic ...</p>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>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</p>	<p>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p>Change the allocation amounts to what is currently allocated or more if spare water has been identified</p>



<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>Schedule R – guideline for stepdown allocations – good schedule and good use of user groups</p> <p>However needs of stock drinking water and rootstock protection needs acknowledged</p> <p>However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish in consultation with water users.</p> <p>As water is cleaned up the minimum flow requirement for dilution is lower.</p> <p>The effects of low flows needs to demonstrated as are the effects of restrictions</p> <p>There also needs to be room for the Whaitua to have their input</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u></p> <p>Table R1 is interim GW to consult with water users</p>
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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)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Paikvale 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:

**Willem Stolte**

Submitter Number:

**S423**





#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



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

688...  
REGIONAL COUNCIL

**Your details**

27 OCT 2015

Full name: Leo Vollebregt

RECEIVED

Organisation name (if applicable): Wairarapa Water User's Inc. Society

4.10 PM

Address for service: Leo Vollebregt

235 Pahautea Road, RD1,

Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lvo11@xtra.co.nz

**Trade competition**

<sup>yes</sup> 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

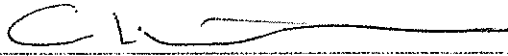
The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.  
21<sup>st</sup> October 2015

Wellington Regional Council  
Wellington

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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

<u>Provision</u>	<u>Text</u>	<u>Support/ Oppose/ Amend</u>	<u>Reasons</u>	<u>Relief sought</u>																									
<u>Definitions</u> <table border="1" data-bbox="207 47 798 2161"> <tr> <td data-bbox="207 47 335 224">Category A groundwater</td> <td data-bbox="207 224 335 627">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.</td> <td data-bbox="207 627 335 1008">amend</td> <td data-bbox="207 1008 335 1456">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.</td> <td data-bbox="207 1456 335 2161">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</td> </tr> <tr> <td data-bbox="335 47 462 224">Category B groundwater (directly connected)</td> <td data-bbox="335 224 462 627">Taking water from Category A groundwater is considered to be surface water allocation.</td> <td data-bbox="335 627 462 1008"></td> <td data-bbox="335 1008 462 1456"></td> <td data-bbox="335 1456 462 2161"></td> </tr> <tr> <td data-bbox="462 47 590 224">Category B groundwater (not directly connected)</td> <td data-bbox="462 224 590 627">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). 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There should also be a clear and quantifiable difference between Category A &amp; 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.</td> <td data-bbox="462 1456 590 2161"></td> </tr> <tr> <td data-bbox="590 47 718 224">Category C groundwater</td> <td data-bbox="590 224 718 627">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. 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	<p>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.</p>		<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	
<p>groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>amend</p>	<p>There is no definition of what directly connected means.</p>	<p>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</p> <p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>		<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 roundwater irectly connected o surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and <del>maximised</del> the amount is increased through time, including by means of:</p> <p>(a) to (e) are good means to the objective.</p> <p>Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain</p> <p>Add (c) <u>consents will run for a period of 25 years</u></p>



	<p>(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 whatua or sub-catchment.</p>			
<p>Policy P7: Uses of and water (b) and (h)</p>	<p>(b) treatment, dilution and disposal of wastewater and stormwater, and</p> <p>(h) irrigation and stock water, and</p>	<p>Amend</p> <p>support</p>	<p>(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.</p> <p>We are pleased to see irrigation get a special mention.</p>	<p>Add <u>diffuse contaminants to</u> (b)</p> <p>retain</p>
<p>Policy P11: In-stream water storage</p>	<p>The benefits associated with the damming and storing of water within the bed of a river are recognised when:</p> <p>(c) there are significant social and economic benefits for the region, and</p> <p>(d) water remains available for multiple in-stream and out of stream uses concurrently, and</p> <p>(e) the reliability of water supply improves as a result, and</p> <p>(f) the damming and storage of water contributes to the</p>	<p>support</p>		<p>retain</p>

	efficient allocation and use of water.			
<p>Policy P107: Framework for taking and using water</p>	<p>The framework for the take and use of water recognises:</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	<p>amend</p>	<p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have a significant part to play in establishing the evidence</u> Insert (d) when schedule P changes: <u>-ve effect on consent holders – 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately.</u></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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.</p>	<p>support</p>	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whatitua chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p><u>Category A groundwater which shall be required to reduce take by 50% of the amount consented</u></p>

<p>ows and water -vels )</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:  (c) as authorised by resource consents in accordance with Policy P108.</p>	<p>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%.</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p>
<p>Policy P115: authorising takes below minimum flows and lake levels</p>	<p>(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p>	<p>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.</p>	<p>As above</p>
<p>(d) and (c) i</p>	<p>(c) permanent horticultural or viticultral root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p>	<p>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</p>	<p>Delete (c) (i)</p>
	<p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation restrictions imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>Amend</p>	
	<p>oppose</p>		



	operative to meet the criteria, and		
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	Support	Retain
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.</p>	Support	Retain
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	Support	retain

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>			
<p>Rules</p>			<p>amend</p>	<p>amend</p>
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>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</p>	<p>Make this rule <u>restricted discretionary</u></p>	
<p>rule R137: Farm fairy washdown</p>	<p>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</p>			

<p>id milk-cooling after – permitted activity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>(b) delete words after "... property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: Temporary water permit transfers – controlled activity</p>	<p>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:</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: Transferring water permits – restricted discretionary activity</p>	<p>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:</p>	<p>retain</p>	<p>retain</p>
<p>Other methods</p>			

Method M13: Wairarapa water races	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 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  (c) 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 management (d)	(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 <u>quantify costs and benefits of water races and explore alternatives</u>
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	support	good method esp. the use of the words "collaboration with industry"	retain



	<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>		
<p><u>tuamahanga</u> <u>Whaitua</u></p> <p>Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>amend</p>	<p>insert after - adverse effects – <u>that are measured on aquatic ...</u></p>
<p>Figures 7.3 – 7.8</p>	<p>Again the categories need <u>empirical</u> 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</p>	<p>Oppose</p>	<p><u>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</u></p>
<p>Tables 7.3 – 7.5</p>	<p>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.</p>	<p>Oppose</p>	<p><u>Change the allocation amounts to what is currently allocated or more if spare water has been identified</u></p>
<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>	<p>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.</p>	<p>Water allocation amounts</p> <p>Surface and groundwater allocation amounts</p>	



<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>Schedule R – guideline for stepdown allocations – good schedule and good use of user groups  However needs of stock drinking water and rootstock protection needs acknowledged  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</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
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Table R1: Stepdown allocations for rivers in the Ruamāhanga River catchment

River	Minimum flow (L/sec)	Flow at which other 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:

**Gary Svenson**

Submitter Number:

**S424**



#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



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

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21 OCT 2015  
4:10 PM

**Your details**

Full name: Leo Vollebregt  
Organisation name (if applicable): Wairarapa Water User's Inc. Society  
Address for service: Leo Vollebregt  
235 Pahautea Road, RD1,  
Featherston  
Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405  
Contact person: Leo Vollebregt  
Address and telephone no (if different from above): \_\_\_\_\_

**Electronic communication**

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.

Email address: lvoll@xtra.co.nz

**Trade competition**

**yes** 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']

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 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.

**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](http://www.gw.govt.nz/regional-plan-review)

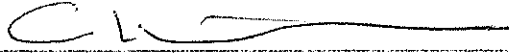
The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  .....	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> 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): →	

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Attendance 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 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.

Signature:



Date:

20/10/2015

[Person making submission or person authorised to sign  
on behalf of person making submission. NB. Not required if making an  
electronic submission]

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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,  
c/- Leo Vollebregt,  
235 Pahautea Road,  
RD1,  
Featherston.

Wellington Regional Council  
Wellington

21<sup>st</sup> 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 25<sup>th</sup> 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 23<sup>rd</sup> 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	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

**Wairarapa Water User's Inc. Society**

**Submission on the**

**Proposed Natural Resources Plan**

<u>Provision</u>	<u>Text</u>	<u>Support/ Oppose/ Amend</u>	<u>Reasons</u>	<u>Relief sought</u>
<u>Definitions</u>	<p>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.</p> <p>Taking water from <b>Category A groundwater</b> is considered to be <b>surface water allocation</b>.</p>	amend	<p>The categorisation of groundwater needs clarification in the definitions.</p> <p>The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt.</p> <p>Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.</p>	<p>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</p>
<p><b>Category A groundwater</b></p>	<p>Groundwater not classified as either <b>category A groundwater</b> or <b>category C groundwater</b> and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). <b>Category B groundwater (directly connected)</b> 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 <b>category B groundwater (directly connected)</b> is considered to be <b>surface water allocation</b>.</p>		<p>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 &amp; 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.</p>	
<p><b>Category B groundwater (not directly connected)</b></p>	<p>Groundwater not classified as either <b>category A groundwater</b> or <b>category C groundwater</b> and which is defined as being not directly connected to surface water through applying the tests in Schedule Q (efficient use). <b>Category B groundwater (not directly connected)</b> 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 <b>category B groundwater (not directly connected)</b> is considered to be groundwater allocation.</p>		<p>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 working by the river reported no adverse</p>	
<p><b>Category C groundwater</b></p>	<p>Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,</p>			

<p>Groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p>	<p>amend</p>	<p>effects to this take at low flows indicating poor relation of the takes to the river.</p>	<p>Groundwater 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</p>
<p>Groundwater directly connected to surface water regionally significant infrastructure*</p>	<p>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.</p> <ul style="list-style-type: none"> <li>the local authority wastewater and stormwater networks, systems and wastewater treatment plants</li> </ul>	<p>amend</p>	<p>There is no definition of what directly connected means.</p> <p>Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water</p>	<p>Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops</p>
<p>Unused water</p>	<p>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.</p>	<p>support</p>	<p>retain</p>	<p>retain</p>
<p>Objective O8</p>	<p>The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.</p>	<p>amend</p>	<p>Objective does not give enough value to the use and potential use of water.</p>	<p>the social, agricultural, industrial, cultural and environmental benefits of taking and using water for current uses and also for future needs are recognised and provided for within the Plan's allocation framework"</p>
<p>Objective O25 (c)</p>	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(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</p>	<p>Oppose</p>	<p>Objective (c) aims to meet certain standards - this objective should not be giving guidance to the Whaitua before current water quality levels are known</p>	<p>Remove</p>

<p>able 3.6 groundwater directly connected to surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p><u>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</u></p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> <li>(a) efficient infrastructure, and</li> <li>(b) <b>good management practice</b>, including irrigation, domestic municipal and industry practices, and</li> <li>(c) maximising reuse, recovery and recycling of water and contaminants, and</li> <li>(d) enabling water to be transferred between users, and</li> <li>(e) enabling water storage outside river beds.</li> </ul>	<p>amend</p>	<p>Increasing water allocation allows for growth.</p> <p>(a) to (e) are good means to the objective.</p> <p>There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of:</p> <p>(a) to (e) are good means to the objective.</p> <p>Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a <b>whatua</b> or <b>sub-catchment</b>, if:</p> <ul style="list-style-type: none"> <li>(a) the affected resource is fully allocated or over-allocated, or</li> </ul>	<p>Support/ amend</p>	<p>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.</p>	<p>Retain</p> <p>Add (c) <u>consents will run for a period of 25 years</u></p>

	<p>(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 <b>whatua</b> or sub-catchment.</p>			
<p>Policy P7: Uses of and water (b) and (h)</p>	<p>(b) treatment, dilution and disposal of <b>wastewater</b> and <b>stormwater</b>, and</p> <p>(h) irrigation and stock water, and</p>	<p>Amend</p> <p>support</p>	<p>(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.</p> <p>We are pleased to see irrigation get a special mention.</p>	<p>Add <u>diffuse contaminants to</u> (b)</p> <p>retain</p>
<p>Policy P11: In-stream water storage</p>	<p>The benefits associated with the damming and storing of water within the bed of a river are recognised when:</p> <p>(c) there are significant social and economic benefits for the region, and</p> <p>(d) water remains available for multiple in-stream and out of stream uses concurrently, and</p> <p>(e) the reliability of water supply improves as a result, and</p> <p>(f) the damming and storage of water contributes to the</p>	<p>support</p>		<p>retain</p>

<p>Policy P107: framework for taking and using water</p>	<p>efficient allocation and use of water.</p>	<p>amend</p>	<p>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.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have significant part to play in establishing the evidence</u> 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."</p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>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 provisions.</p>	<p>support</p>	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>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.</p> <p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whatua chapters (chapters 7-</p>	<p>Amend</p>	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p>Category A groundwater which shall be required to reduce take by 50% of the amount consented</p>



<p>flows and water levels</p> <p>)</p> <p>Policy P115: authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below <b>minimum flows</b>:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above <b>minimum flows</b>, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after <b>minimum flow</b> cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>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%.</p> <p>As above</p> <p>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.</p> <p>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</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
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<p>Policy P116: Reallocating water</p>	<p>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 <i>whaitua</i> chapters of the Plan (chapters 7, 8 and 10) is exceeded.</p>	<p>Support</p>	<p>Retain</p>	
<p>Policy P117: Supplementary allocation amounts at flows above the median flow</p>	<p>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.</p>	<p>support</p>	<p>retain</p>	
<p>Policy P118: Reasonable and efficient use</p>	<p>The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of:</p> <p>(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</p>	<p>amend</p>	<p>The investment in infrastructure is considerable and time is required to implement changes</p>	<p>(a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made-operative <u>renewal of consent to meet the criteria</u></p>

	operative to meet the criteria, and			
<p>Policy P119: unused water</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) a capital expenditure programme linked to the purpose water is used for, and</li> <li>(b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use).</li> </ul>	Support		Retain
<p>Policy P120: taking water for storage</p>	<p>The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P17 is satisfied.</p>	Support		Retain
<p>Policy P128: transfer of resource consents</p>	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the adverse effects of the take and use of transferred water are the same or less, and</li> </ul>	Support		retain

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(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).</p>		
<p><u>Rules</u></p>			
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>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.</p>	<p>amend</p>	<p>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</p>
<p>Rule R137: Farm dairy washdown</p>	<p>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</p>	<p>amend</p>	<p>Make this rule <u>restricted discretionary</u></p>

<p>id milk-cooling ater – permitted :ivity )</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>	<p>(b) delete words after "...property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(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</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>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.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>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:</p>	<p>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</p>	<p>Delete Controlled and make this rule a permitted activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary activity</p>	<p>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:</p>	<p>support</p>	<p>retain</p>
<p>Other methods</p>			

<p>Method M13: Wairarapa water races</p>	<p>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:</p>	<p>amend</p>	<p>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.</p>	<p>In opening paragraph insert after cultural values and economic values of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> <li>(a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and</li> <li>(b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and</li> <li>(c) provide, where available, accurate technical information to assist user groups.</li> </ul>	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> <li>(d) promoting alternatives to the use of water races, and</li> </ul>	<p>amend</p>	<p>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.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>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</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	<p>implementation of policies which rely on good management practice to achieve desired environmental outcomes.</p>		<p>positive move which will have farmers moving forward in their practices with the reg. council??</p>	
<p><u>Ruamahanga Whaitua</u> Policy R.P3: Cumulative effects on river reaches of allocating water</p>	<p>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.</p>	<p>amend</p>	<p>Important that the effects are measured, not just modelled.</p>	<p>Insert after - adverse effects – that are measured on aquatic ...</p>
<p><u>Figures 7.3 – 7.8</u></p>	<p>Water allocation amounts</p>	<p>Oppose</p>	<p>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</p>	<p>Do not include figures 7.3 – 7.8 in the plan until categories have been verified</p>
<p><u>Tables 7.3 – 7.5</u></p>	<p>Surface and groundwater allocation amounts</p>	<p>Oppose</p>	<p>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.</p>	<p>Change the allocation amounts to what is currently allocated or more if spare water has been identified</p>

<p><u>Schedule P:</u>  Reasonable and efficient use criteria</p>	<p><u>Schedule Q:</u>  Reasonable and efficient use criteria</p>	<p>oppose</p>	<p>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.</p>	<p>Needs empirical calibration by GW</p>
<p>Schedule P:  Reasonable and efficient use criteria</p>	<p>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.</p>	<p>Amend</p>	<p>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.</p> <p>irrigators with lower efficiency may be more suitable for specific crops and farming situations. Case by case systems need to be assessed</p>	<p>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.</p>



<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach <b>minimum flows</b>. 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.</p>	<p>Support with amendments</p>	<p>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 Whatua to have their input</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u>  Table R1 is interim GW to consult with water users</p>
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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)	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:

**Beryl Stuart**

Submitter Number:

**S426**



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## 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: Beryl Masters Stuart  
Company name: Woodleigh Farm Trust  
Address1: 107 Manuka Street  
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#### 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 adversely 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 and 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 right to appeal 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 hearing

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, Carterton 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](mailto:Nicholas.Cooper@opus.co.nz)

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### 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']

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### 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 protection 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 (agrchemicals 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

<b><i>Specific Provision</i></b>	<b><i>Request</i></b>	<b><i>Reason</i></b>
<i>Rule 36: Agrichemicals – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule.</p> <p>Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.</p>	<p>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.</p>
<i>Rule R83: Discharge of collected animal effluent onto or into land – controlled activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule by deleting condition (e)(iii).</p>	<p>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.</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
<i>Rule R89: Farm refuse dumps – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule by deleting condition (d)(iii).</p>	<p>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).</p>
<i>Rule R90: Manufacture and storage of silage and compost – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend condition (d) of the rule by inserting the word “permanent” in front of ‘silage storage area’ as follows;</p> <p>(d) the walls and floor of a <u>permanent</u> silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and</p> <p>Or any other equivalent change</p>	<p>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.</p>
<i>Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity</i>	<p><u>Relief sought</u></p> <p>Request that the rule be deleted.</p> <p>Or any other equivalent</p>	<p>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</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
	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?
<i>Rule R94: Cultivation or tilling of land – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a) cultivation shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel.</u></p> <p>Add new condition as follows;</p> <p><u>(xx) cultivation shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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.</p> <p>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 coarse or fine contaminant particle flows to water, various setback distances and the influence of vegetation.</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
<p><i>Rule R95: Break-feeding – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a)-break-feeding shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel.</u></p> <p>Add new condition as follows;</p> <p><u>(xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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 farm paddock.</p>
<p><i>Rule R121: Maintenance of drains – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in terms of inserting a new condition;</p> <p><u>(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.</u></p> <p>and amend to the following conditions;</p> <p>(g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket <u>with a curved flat base, and a slatted back</u> that permits the easy drainage of water and fish back into the drain <u>which reduces the likelihood of pest plant</u></p>	<p>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.</p> <p>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.</p> <p>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</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
	<p><u>material being spread through the drain, and</u></p> <p>(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, <u>or listed as an Unwanted Organism under the Biosecurity Act 1993</u>), and</p> <p>Or any other equivalent change</p>	<p>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.</p>
<p><i>Rule R122: Removing vegetation – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in terms of the changes to the following conditions;</p> <p>(h) if mechanically clearing aquatic vegetation from an area of river or lake bed covered with water, the machinery must use a weed bucket <del>with a curved flat base, and a slatted back</del> that permits the easy drainage of water and fish back into the drain <u>and which reduces the likelihood of pest plant material being spread through the river, and</u></p> <p>(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, <u>or listed as an Unwanted</u></p>	<p>Same reason as for Rule 121.</p>


<i>Specific Provision</i>	<i>Request</i>	<i>Reason</i>
	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.



Craig Dairy Farm Ltd Submission on Proposed Natural Resources Plan

Signature of submitter  Date 22 OCTOBER 2015  
RAYMOND BRIAN CRAIG



Proposed Natural Resources Plan:

Submitter:

**AB & DE Smith**

Submitter Number:

**S427**



5427

## 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

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 adversely affects my business 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)

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).]

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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, Carterton RD 1)
- Lewis Herrich (1513 State Highway 53, Martinborough)
- Blair Percy (36 Masterton Stronvar Road, Masterton)
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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](mailto:Nicholas.Cooper@opus.co.nz)

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### 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 protection 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

<b><i>Specific Provision</i></b>	<b><i>Request</i></b>	<b><i>Reason</i></b>
<i>Rule 36: Agrichemicals – permitted activity</i>	<p><u>Relief sought</u> Amend the rule.</p> <p>Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.</p>	<p>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.</p>
<i>Rule R83: Discharge of collected animal effluent onto or into land – controlled activity</i>	<p><u>Relief sought</u> Amend the rule by deleting condition (e)(iii).</p>	<p>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.</p>

<b><i>Specific Provision</i></b>	<b><i>Request</i></b>	<b><i>Reason</i></b>
<i>Rule R89: Farm refuse dumps – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule by deleting condition (d)(iii).</p>	<p>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).</p>
<i>Rule R90: Manufacture and storage of silage and compost – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend condition (d) of the rule by inserting the word “permanent” in front of ‘silage storage area’ as follows;</p> <p>(d) the walls and floor of a <u>permanent silage</u> storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and</p> <p>Or any other equivalent change</p>	<p>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.</p>
<i>Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity</i>	<p><u>Relief sought</u></p> <p>Request that the rule be deleted.</p> <p>Or any other equivalent</p>	<p>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</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
	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?
<i>Rule R94: Cultivation or tilling of land – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a) cultivation-shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel.</u></p> <p>Add new condition as follows;</p> <p><u>(xx) cultivation shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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.</p> <p>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 coarse or fine contaminant particle flows to water, various setback distances and the influence of vegetation.</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
<p><i>Rule R95: Break-feeding – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a)-break-feeding shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel,</u></p> <p>Add new condition as follows;</p> <p><u>(xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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.</p>
<p><i>Rule R121: Maintenance of drains – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in terms of inserting a new condition;</p> <p><u>(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.</u></p> <p>and amend to the following conditions;</p> <p>(g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket with a curved flat base <del>and a slatted back</del> that permits the easy drainage of water and fish back into the drain <u>which reduces the likelihood of pest plant</u></p>	<p>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.</p> <p>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.</p> <p>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</p>

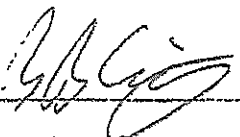
<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
	<p><u>material being spread through the drain, and</u></p> <p>(j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, <u>or listed as an Unwanted Organism under the Biosecurity Act 1993</u>), and</p> <p>Or any other equivalent change</p>	<p>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.</p>
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	<u>Organism under the Biosecurity Act 1993</u> ), and ...  Or any other equivalent change	

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Signature of submitter  Date 22 OCTOBER 2015  
RAYMOND BRIAN CRAIG



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: C/- N E Smallwood  
 Address2: 19 Homestead Lane  
 Address3:  
 Address4:  
 Town: Greytown  
 Postcode:  
 Telephone Work:  
 Telephone Home: 61393782799  
 Telephone Cell:  
 Email address: [berwick.farm@yahoo.com](mailto:berwick.farm@yahoo.com)

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

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

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Date: 20/10/2015



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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;

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Address for service: C/- Opus International Consultants Ltd  
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[Nicholas.Cooper@opus.co.nz](mailto:Nicholas.Cooper@opus.co.nz)

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

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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

<b><i>Specific Provision</i></b>	<b><i>Request</i></b>	<b><i>Reason</i></b>
<i>Rule 36: Agrichemicals – permitted activity</i>	<p><u>Relief sought</u> Amend the rule. Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.</p>	<p>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.</p>
<i>Rule R83: Discharge of collected animal effluent onto or into land – controlled activity</i>	<p><u>Relief sought</u> Amend the rule by deleting condition (e)(iii).</p>	<p>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.</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
<i>Rule R89: Farm refuse dumps – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule by deleting condition (d)(iii).</p>	<p>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).</p>
<i>Rule R90: Manufacture and storage of silage and compost – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend condition (d) of the rule by inserting the word “permanent” in front of ‘silage storage area’ as follows;</p> <p>(d) the walls and floor of a <u>permanent silage</u> storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and</p> <p>Or any other equivalent change</p>	<p>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.</p>
<i>Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity</i>	<p><u>Relief sought</u></p> <p>Request that the rule be deleted.</p> <p>Or any other equivalent</p>	<p>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</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
	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?
<i>Rule R94: Cultivation or tilling of land – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a) cultivation-shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel.</u></p> <p>Add new condition as follows;</p> <p><u>(xx) cultivation shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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.</p> <p>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 coarse or fine contaminant particle flows to water, various setback distances and the influence of vegetation.</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
<p><i>Rule R95: Break-feeding – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a)-break-feeding shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel.</u></p> <p>Add new condition as follows;</p> <p><u>(xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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.</p>
<p><i>Rule R121: Maintenance of drains – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in terms of inserting a new condition;</p> <p><u>(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.</u></p> <p>and amend to the following conditions;</p> <p>(g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket <del>with a curved flat-base, and a slatted back</del> that permits the easy drainage of water and fish back into the drain <u>which reduces the likelihood of pest plant</u></p>	<p>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.</p> <p>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.</p> <p>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</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
	<p><u>material being spread through the drain, and</u></p> <p>(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, <u>or listed as an Unwanted Organism under the Biosecurity Act 1993</u>), and</p> <p>Or any other equivalent change</p>	<p>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.</p>
<p><i>Rule R122: Removing vegetation – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in terms of the changes to the following conditions;</p> <p>(h) if mechanically clearing aquatic vegetation from an area of river or lake bed covered with water, the machinery must use a weed bucket <del>with a curved flat base, and a slatted back that</del> permits the easy drainage of water and fish back into the drain <u>and which reduces the likelihood of pest plant material being spread through the river, and</u></p> <p>(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, <u>or listed as an Unwanted</u></p>	<p>Same reason as for Rule 121.</p>

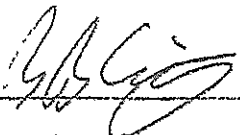
<i>Specific Provision</i>	<i>Request</i>	<i>Reason</i>
	<u>Organism under the Biosecurity Act 1993</u> ), and ...  Or any other equivalent change	

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.



Craig Dairy Farm Ltd Submission on Proposed Natural Resources Plan

Signature of submitter  Date 22 OCTOBER 2015  
RAYMOND BRIAN CRAIG



Proposed Natural Resources Plan:

Submitter:

**Blair Percy**

Submitter Number:

**S429**



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## 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  
Address1: 36 Masterton Stronvar Road  
Address2: RD 6  
Address3:  
Address4:  
Town: Masterton  
Postcode: 5886  
Telephone Work: 027 499 0241  
Telephone Home: 06 377 5581  
Telephone Cell: 027 499 0241  
Email address: [blair.deanne@xtra.co.nz](mailto: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 adversely 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 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 hearing

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, Carterton 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](mailto:Nicholas.Cooper@opus.co.nz)

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### 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'*]

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### 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 agricultural (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 (agricultural chemicals 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 Wairarapa, 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);

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<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
<p><i>Rule R95: Break-feeding – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a)-break-feeding shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel.</u></p> <p>Add new condition as follows;</p> <p><u>(xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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.</p>
<p><i>Rule R121: Maintenance of drains – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in terms of inserting a new condition;</p> <p><u>(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.</u></p> <p>and amend to the following conditions;</p> <p>(g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket with a curved flat base <del>and a slatted back</del> that permits the easy drainage of water and fish back into the drain <u>which reduces the likelihood of pest plant</u></p>	<p>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.</p> <p>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.</p> <p>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</p>

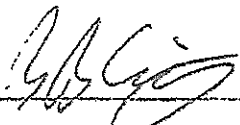
<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
	<p><u>material being spread through the drain</u>, and</p> <p>(j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington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

<i>Specific Provision</i>	<i>Request</i>	<i>Reason</i>
	<u>Organism under the Biosecurity Act 1993</u> ), and ...  Or any other equivalent change	

6. The submitter wishes ~~to~~ ~~not~~ wish to be heard in support of its submission

7. If others make a similar submission the submitter does ~~not~~ want to present a joint case at a hearing.



Signature of submitter  Date 22 OCTOBER 2015  
RAYMOND BRIAN CRAIG



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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Postcode:  
Telephone Work: 027 609 9522  
Telephone Home:  
Telephone Cell: 027 609 9522  
Email address: [toviewadream@wizbiz.net.nz](mailto: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 adversely affects my business 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 my business and 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).]

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

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, Carterton 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)
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- 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](mailto:Nicholas.Cooper@opus.co.nz)

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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'*]

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### 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 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 protection 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 (agricultural chemicals 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 Wairarapa, 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

<b><i>Specific Provision</i></b>	<b><i>Request</i></b>	<b><i>Reason</i></b>
<i>Rule 36: Agrichemicals – permitted activity</i>	<p><u>Relief sought</u> Amend the rule.</p> <p>Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.</p>	<p>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.</p>
<i>Rule R83: Discharge of collected animal effluent onto or into land – controlled activity</i>	<p><u>Relief sought</u> Amend the rule by deleting condition (e)(iii).</p>	<p>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.</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
<i>Rule R89: Farm refuse dumps – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule by deleting condition (d)(iii).</p>	<p>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).</p>
<i>Rule R90: Manufacture and storage of silage and compost – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend condition (d) of the rule by inserting the word “permanent” in front of ‘silage storage area’ as follows;</p> <p>(d) the walls and floor of a <u>permanent silage</u> storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and</p> <p>Or any other equivalent change</p>	<p>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.</p>
<i>Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity</i>	<p><u>Relief sought</u></p> <p>Request that the rule be deleted.</p> <p>Or any other equivalent</p>	<p>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</p>

<i>Specific Provision</i>	<i>Request</i>	<i>Reason</i>
	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?
<i>Rule R94: Cultivation or tilling of land – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a) cultivation-shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel.</u></p> <p>Add new condition as follows;</p> <p><u>(xx) cultivation shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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.</p> <p>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 coarse or fine contaminant particle flows to water, various setback distances and the influence of vegetation.</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
<p><i>Rule R95: Break-feeding – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a)-break-feeding shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel.</u></p> <p>Add new condition as follows;</p> <p><u>(xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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 farm paddock.</p>
<p><i>Rule R121: Maintenance of drains – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in terms of inserting a new condition;</p> <p><u>(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.</u></p> <p>and amend to the following conditions;</p> <p>(g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket <del>with a curved flat base, and a slatted back</del> that permits the easy drainage of water and fish back into the drain <u>which reduces the likelihood of pest plant</u></p>	<p>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.</p> <p>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.</p> <p>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</p>

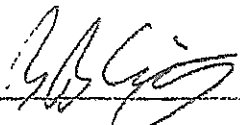
<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
	<p><u>material being spread through the drain, and</u></p> <p>(j) floating debris and plant material shall be prevented from drifting away and causing obstructions to the river or lake bed, or spreading pest plants (as listed in the Greater Wellington Regional Pest Management Strategy 2002-2022 operative at the time, <u>or listed as an Unwanted Organism under the Biosecurity Act 1993</u>), and</p> <p>Or any other equivalent change</p>	<p>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.</p>
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<i>Specific Provision</i>	<i>Request</i>	<i>Reason</i>
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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  Date 22 OCTOBER 2015  
RAYMOND BRIAN CRAIG



Proposed Natural Resources Plan:

Submitter:

**Garry Daniell**

Submitter Number:

**S431**



## 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: Garry Daniell  
 Company name:  
 Address1: Te Ore Ore Road  
 Address2:  
 Address3:  
 Address4:  
 Town  
 Postcode:  
 Telephone Work:  
 Telephone Home:  
 Telephone Cell:  
 Email address: [gdaniell125@gmail.com](mailto:gdaniell125@gmail.com)

#### Trade competition

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To: Chief Executive, Greater Wellington Regional Council

**1. This is a submission from:**

Submitter Details: Craig Dairy Farm Ltd

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PO Box 12 003  
Wellington 6144  
Attention: Nicholas Cooper

Phone: 04-471-7120

[Nicholas.Cooper@opus.co.nz](mailto:Nicholas.Cooper@opus.co.nz)

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**3. The specific provisions of the proposal that this submission relates to are:**

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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.

- 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 (agricultural chemicals 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 Wairarapa, 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

<b><i>Specific Provision</i></b>	<b><i>Request</i></b>	<b><i>Reason</i></b>
<i>Rule 36: Agrichemicals – permitted activity</i>	<p><u>Relief sought</u> Amend the rule. Remove criterion (e) requiring that there is no discharge within a community drinking water supply protection area.</p>	<p>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.</p>
<i>Rule R83: Discharge of collected animal effluent onto or into land – controlled activity</i>	<p><u>Relief sought</u> Amend the rule by deleting condition (e)(iii).</p>	<p>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.</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
<i>Rule R89: Farm refuse dumps – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule by deleting condition (d)(iii).</p>	<p>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).</p>
<i>Rule R90: Manufacture and storage of silage and compost – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend condition (d) of the rule by inserting the word “permanent” in front of ‘silage storage area’ as follows;</p> <p>(d) the walls and floor of a <u>permanent silage</u> storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water, and</p> <p>Or any other equivalent change</p>	<p>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.</p>
<i>Rule 92: All discharges to land within community drinking water supply protection areas – restricted discretionary activity</i>	<p><u>Relief sought</u></p> <p>Request that the rule be deleted.</p> <p>Or any other equivalent</p>	<p>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</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
	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?
<i>Rule R94: Cultivation or tilling of land – permitted activity</i>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a) cultivation-shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel.</u></p> <p>Add new condition as follows;</p> <p><u>(xx) cultivation shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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.</p> <p>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 coarse or fine contaminant particle flows to water, various setback distances and the influence of vegetation.</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
<p><i>Rule R95: Break-feeding – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in relation to condition (a) as follows;</p> <p>(a)-break-feeding shall not occur within 5m of a surface water body <u>for those surface water bodies with a wetted channel width of greater than 2m of wetted channel.</u></p> <p>Add new condition as follows;</p> <p><u>(xx) break-feeding shall not occur within 2m of a surface water body with a wetted channel width of less than 2m.</u></p> <p>Or any other equivalent change</p>	<p>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 farm paddock.</p>
<p><i>Rule R121: Maintenance of drains – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in terms of inserting a new condition;</p> <p><u>(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.</u></p> <p>and amend to the following conditions;</p> <p>(g) if mechanically clearing aquatic vegetation, the machinery must use a weed bucket <del>with a curved flat base, and a slatted back</del> that permits the easy drainage of water and fish back into the drain <u>which reduces the likelihood of pest plant</u></p>	<p>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.</p> <p>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.</p> <p>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</p>

<b>Specific Provision</b>	<b>Request</b>	<b>Reason</b>
	<p><u>material being spread through the drain</u>, and</p> <p>(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, <u>or listed as an Unwanted Organism under the Biosecurity Act 1993</u>), and</p> <p>Or any other equivalent change</p>	<p>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.</p>
<p><i>Rule R122: Removing vegetation – permitted activity</i></p>	<p><u>Relief sought</u></p> <p>Amend the rule in terms of the changes to the following conditions;</p> <p>(h) if mechanically clearing aquatic vegetation from an area of river or lake bed covered with water, the machinery must use a weed bucket <del>with a curved flat base, and a slatted back</del> that permits the easy drainage of water and fish back into the drain <u>and which reduces the likelihood of pest plant material being spread through the river</u>, and</p> <p>(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, <u>or listed as an Unwanted</u></p>	<p>Same reason as for Rule 121.</p>

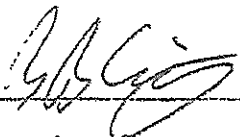
<i>Specific Provision</i>	<i>Request</i>	<i>Reason</i>
	<u>Organism under the Biosecurity Act 1993</u> ), and ...  Or any other equivalent change	

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.



Craig Dairy Farm Ltd Submission on Proposed Natural Resources Plan

Signature of submitter  Date 22 OCTOBER 2015  
RAYMOND BRIAN CRAIG



Proposed Natural Resources Plan:

Submitter:

**Glen and Angie Meredith**

Submitter Number:

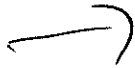
**S432**



S432

Wellington Regional Council  
08 OCT 2015

FILE REF:	
EXTR-11-23	
Doc. No.	
Referred to	Int
C. LAIDLAW	
D. Streat	



RD12 Masterton  
5 October 2015

Mr Chris Laidlaw  
Chair  
Greater Wellington Regional Council  
PO Box 11646  
Wellington 6142

Dear Mr Laidlaw

**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 Iwi, 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 Iwi, 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 Iwi 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

  
Glen Meredith

  
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**



**SUBMISSION on the proposed Natural Resources Plan for the Wellington Region**

To: [regionalplan@gw.govt.nz](mailto: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@Farmside.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	<i>Eg, Sheep, Beef, Arable, Dairy, agricultural business</i>
Farm size (area)	586 hectares
Main Waterways	
GW Soil plan or Farm Plan	Yes <del>No</del>
Environmental investments	fenced riparian areas, waterways and wetlands - Native Bush retired & fenced
QE2 or Retirement Blocks	
General Comments	<i>Eg, if you like the partnership approach with council staff on the ground, say so</i>



# SUBMISSION on the proposed Natural Resources Plan for the Wellington Region

To: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz) OR Freepost 3156, GWRC, PO Box 11646, Wellington 6142

<b>Name</b>	Quentin Connell (NZDFA – Wairarapa Branch Vice-Chair)
<b>Organisation</b>	New Zealand Deer Farmers' Association – Wairarapa Branch (NZDFA-Wairarapa)
<b>Physical Address</b>	121 Perry's Rd. RD 7 Masterton
<b>Phone Number</b>	063771154
<b>Email Address</b>	<a href="mailto:Connell.brookes@clear.net.nz">Connell.brookes@clear.net.nz</a>

**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:  

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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

### NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
<p>Extend the timeframes for stock exclusion, e.g.</p> <ul style="list-style-type: none"> <li>• Category One by 2020</li> <li>• Category Two by 2025</li> </ul>	<p>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.</p> <p>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.</p> <p>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).</p>
<p>Sheep or goats are not excluded from Category One</p>	<p>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.</p> <p>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.</p>
<p>Specify that stock exclusion from spawning sites – inanga or trout – is during the spawning season.</p>	<p>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</p>

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 “ <i>directly opposite each other</i> ” 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	<p>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 “<i>The New Zealand Deer Farmers’ Landcare Manual 2012</i>” on page 18 (follow the <a href="#">link here</a>).</p> <p>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).</p>

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 guarantee 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

NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
<p>Amend condition a) to reflect the practicalities of aerial fertiliser application</p>	<p>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.</p> <p>Condition a) will cause a health and safety risk to the operation of aerial fertilizer application.</p> <p>Environment Canterbury’s operative Land and Water Plan rule for aerial fertiliser application provides a pragmatic approach:</p> <p><b>5.66 <i>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:</i></b></p> <ol style="list-style-type: none"> <li>1. <i>There is no fertiliser discharged when the soil moisture exceeds field capacity and</i></li> <li>2. <i>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</i></li> </ol> <p>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.</p>

## 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**

**NZDFA-Wairarapa seeks the following changes:**

Changes Sought	Comments and Reasons
Rule 89: Farm Refuse Dumps <ul style="list-style-type: none"><li>- increase size from 50 m<sup>3</sup> to 100 m<sup>3</sup></li><li>- heavily prune the fourteen other conditions to focus on clear effects</li></ul>	These are existing activities on farms. NZDFA-Wairarapa is unaware of any monitoring or studies that show that refuse dumps or offal pits significantly contribute to adverse impacts on water or air quality and so multiple conditions are not needed.
Rule 91: Offal Pits <ul style="list-style-type: none"><li>- retain condition a) re only containing dead matter from the property; and condition h) odour is not offensive beyond the boundary</li><li>- heavily prune the other seven conditions to focus on effects</li></ul>	

## 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

NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
Change the definition to specify this does not include baleage	Self-explanatory
Delete the requirement for impermeable lining; retain the condition that there be no discharge to water	<p>Impermeable lining will impose additional costs that may not contribute to a beneficial environmental outcome – a cost-benefit analysis would be helpful for this requirement. The condition that there is no discharge to water is more appropriate.</p> <p>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.</p>

## 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**

**NZDFA-Wairarapa seeks the following changes:**

Changes Sought	Comments and Reasons
Delete the conditions requiring 5 m setbacks	<p>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.</p> <p>The pan-primary industry booklet “<a href="#"><i>Industry-agreed Good Management Practices relating to water quality</i></a>” 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.</p> <p>Such risk-based approaches are more appropriately covered under the plan Methods relating to Good Management Practice</p>



## EARTHWORKS

### Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Definition of earthworks

Rule R99: earthworks of a contiguous area up to 3000 m<sup>2</sup> per property per 12 months – permitted

Rule R101: earthworks that doesn't meet permitted conditions - discretionary

**NZDFA-Wairarapa's submission is: ~~support~~/oppose**

**NZDFA-Wairarapa seeks the following changes:**

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

### NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
Change definition of erosion prone	<p>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.</p> <p>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 straight-forward 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.</p>
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 m<sup>2</sup> 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**

**NZDFA-Wairarapa seeks the following changes:**

Changes Sought	Comments and Reasons
<p>Rule 114:</p> <ul style="list-style-type: none"> <li>- Change the 50 ha catchment restriction to 200 ha</li> <li>- Increase the size for fords and bridges (20 m<sup>2</sup> too small)</li> </ul>	<p>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.</p> <p>The use of fords and stock crossings for <i>intermittent use</i> particularly in hill country may have short-lived and minimal environmental impact.</p> <p>What is the basis for a footprint of 20 m<sup>2</sup>?</p>
<p>Rule 115:</p> <ul style="list-style-type: none"> <li>- Delete the condition restricting culvert diameter; retain condition that the culvert be constructed to allow for 20 year flood event.</li> <li>- Provide advice to landowner of appropriate culvert sizes to achieve the above condition</li> </ul>	<p>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.</p>
<p>Rule 125: Undertake proper assessment of restrictions proposed for mana whenua sites within the plan itself.</p>	<p>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.</p>

# Submission on the Proposed Natural Resources Plan for the Wellington Region

## INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:



Send to: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

### Your details:

Full name: Raquel Moreno  
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Email address: [raquel.moreno@foms.co.nz](mailto:raquel.moreno@foms.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 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)

No  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).]

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:





**Policies**

**My submission on this provision is:**

**Reasons for my submission:**

**I seek the following from WRC (give precise details):**

Policy P7: Uses of land and water

	Amend

Forestry delivers a wide range of benefits including improving water quality, erosion control, carbon sequestration and employment. Include Forestry as beneficial use of land and water resources.













**Rules - Land use**

**My submission on this provision is:**

**Reasons for my submission:**

**I seek the following from WRC (give precise details):**

<p>Rule R99: Earthworks—permitted activity</p>	<p>Amend</p>	<p>The rule sets up 3,000m<sup>2</sup> per property per 12 month period. Currently this is 1,000 m<sup>3</sup> of soil within any 10,000 m<sup>2</sup> per 12 month period. What is the rationale to make it more stringent?</p> <p>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.</p>	<p>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)</p> <p>It needs to be clarified and re-worded.</p>
<p>Rule R101: Earthworks and vegetation clearance – discretionary activity</p>	<p>Amend</p>	<p>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.</p>	<p>It needs to be clarified and re-worded.</p>
<p>Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity</p>	<p>Support</p>	<p>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.</p> <p>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?</p>	<p>Provision of permitted activity for plantation forestry harvesting.</p> <p>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.</p>
<p>Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity</p>	<p>Not stated</p>	<p>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?</p>	<p>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.</p>

<p>Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity</p>	<p>Amend</p>
<p>Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity</p>	<p>Amend</p>

The rule sets that a harvest plan shall be prepared and submitted to the council 20 working days prior to the plantation forestry harvesting. This condition is impractical within small scale and low complexity operations. Is not logical to plan and submit a harvest plan within 20 working days under a permitted activity operation as this time becomes a resource consent process time. Having this time of notification doesn't give any flexibility to operate under a permitted activity. Submitting a harvest plan within 20 working days has to be required only for larger operations (more than 10 ha) and non permitted activities.

Avoid the submission of a harvest plan and reduce the notification time:  
a) for small scale, low complexity and slope <25 degrees permitted activities, 48 hours (it will be under Rule 102A).  
b) for permitted activities on slopes >25 degrees (erosion prone land) 7 days (it will be for Rule 102B).  
c) rest of operations cataloged as non permitted activities, 20 working days (this will be Rule 103)

condition c) "slash is removed from a surface water body where it is blocking river flow or is diverting river flow and causing bank erosion".  
That condition will be never complied with as it is impossible to remove all the slash from a waterbody post harvest. Part of the slash sometimes will remain in the water body but it doesn't mean that it will cause diversion, blockage or bank erosion.

condition c) "whenever safe and practicable to do so, remove potentially unstable slash that has the potential to block or dam a stream flow or divert flow into stream banks in a way that is likely to cause erosion."

**Rules - Wetlands and beds of lakes and rivers**

**My submission on this provision is:**

**Reasons for my submission:**

**I seek the following from WRC (give precise details):**

<p>Rule R104: Structures in natural wetlands and significant natural wetlands – permitted activity</p>	<p>Not stated</p>	<p>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.</p>	<p>Have a harvesting permitted activity rule for natural wetlands.</p>
<p>Rule R104: Structures in natural wetlands and significant natural wetlands – permitted activity</p>	<p>Amend</p>	<p>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.</p>	<p>Allow logs for corduroy temporary crossings on natural wetlands.</p>
<p>Beds of lakes and rivers general conditions</p>	<p>Amend</p>	<p>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"</p>	<p>Reword the condition as " ...shall be removed from the river or lake within five working days" to be aligned within NESPf.</p>
<p>Rule R104: Structures in natural wetlands and significant natural wetlands – permitted activity</p>	<p>Amend</p>	<p>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 opposed to a temporary crossing across a river/stream.</p>	<p>Allow logs for corduroy temporary crossings on natural wetlands.</p>
<p>Rule R114: River crossing structures – permitted activity</p>	<p>Not stated</p>	<p>What about temporary structures/crossings?</p>	<p>Include temporary crossings specific conditions as when the material needs to be removed and that erosion and sediment controls are installed</p>







