

Submitter ID:

File No:



greater WELLINGTON  
REGIONAL COUNCIL  
Te Pane Matua Taiao

## Further Submission

on Proposed Natural Resources Plan  
for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:  
[www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change](http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change)

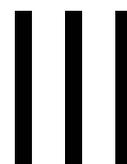
**Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:**

Greater Wellington Regional Council  
Further Submission on Proposed Natural Resources Plan  
for the Wellington Region  
Freepost 3156  
PO Box 11646  
Manners Street  
Wellington 6142

[Regionalplan@gw.govt.nz](mailto:Regionalplan@gw.govt.nz)

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FreePost Authority Number 3156



Greater Wellington Regional Council  
Further Submission on Proposed Natural Resources Plan for the Wellington Region  
Freepost 3156  
PO Box 11646  
Manners Street  
Wellington 6142



Please enter further submission points in the table on the following pages

### C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

<b>Details of the submission you are commenting on</b>  Name of person/ group making original submission and postal address.	<b>Original submission number</b>  The original submission number can be found on the submitter address list.	<b>Position</b>  Whether you support or oppose the submission.	<b>Part(s) of the submission you support or oppose</b>  Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions.	<b>Reasons</b>  Why you support or oppose each submission point.	<b>Relief sought</b>  The part or whole of each submission point you wish to be allowed or disallowed.
e.g. Joanne Bloggs 12 Pine Tree Avenue Redwood	e.g. submitter S102	e.g. Oppose	e.g. Oppose all of submission point S102/41	e.g. The submission point does not recognise...	e.g. Disallow the parts of S102/41 relating to...

If you require more space for additional comments, please click on the comment box on the following page.

**FURTHER SUBMISSION ON THE PROPOSED NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION PREPARED  
ON BEHALF OF THE FERTILISER ASSOCIATION OF NEW ZEALAND**

<b>Name of submitter and postal address</b>	<b>Submission Number</b>	<b>Position</b>	<b>Part(s) of the submission that are supported or opposed</b>	<b>Reasons</b>	<b>Relief sought</b>
Oil Companies C/ Burton Planning Consultants Limited PO Box 33-817 Takapuna Auckland 0740	S55	Support	The conditions of existing resource consents for discharges of contaminants to fresh or coastal water, and to take and use water, may be reviewed pursuant to section 128 of the Resource Management Act 1991 <u>where evidence can be produced of adverse effects attributable to the exercise of the consent.</u>	There is the potential for several plan changes to be initiated through Whaitua committee initiatives during the typical term of a consent. This may reduce certainty to existing consent holders and affect investment decisions. The frequency and scope of the effect of plan changes on existing consents should be limited to s128(a)(i).	Accept the submission in full.
Hutt City Council Allison Tindale Private Bag 31912 Lower Hutt 5040	S84	Support.	Provide a map of the habitats with significant indigenous biodiversity values.	FANZ supports this amendment as it aides understanding and interpretation of the Plan.	Accept the submission in full.
Waste departments of Hutt City Council and Upper Hutt City Council C/ Tonkin & Taylor Ltd PO Box 2083 Wellington 6140	S85	Support.	Inserting clear and frequent references between these chapters.	The Whaitua chapters are not well integrated into the PNRP. There is no cross-referencing to the Whaitua chapters particularly in Chapter 5. FANZ supports this amendment as it aides understanding and interpretation of the Plan.	Accept the submission in full.
Wellington Regional Council PO Box 11646 Manners Street Wellington 6142	S133	Support in part	Rule R42 Amend to include a condition that does not permit the discharge of hazardous substances.	FANZ understands that Rule R42 is only intended to allow minor discharges where it is not provided for by any other rule. However, FANZ is concerned that the term	Accept the submission provided that it does not capture fertiliser.

				hazardous substances could inadvertently capture fertilisers.	
Regional Public Health Dr Jill McKenzie Private Bag 31907 Lower Hutt	S136	Oppose	Rule R82 add new clause: (d) the discharge is not into an area with existing elevated groundwater nitrate levels.	FANZ is concerned with the phrase 'elevated groundwater nitrate levels' and considers that it needs to be quantified i.e. does it mean nitrate levels that exceed the drinking water standard or simply above natural background levels.  FANZ notes that fertiliser applied following good management practice does not necessarily result in excessive leaching loss to ground water. Furthermore, nutrient loss to groundwater can be from a variety of sources, and requires a catchment and systems based management approach. Simply prohibiting fertiliser will not address the issue raised in the submission.	Reject the submission.
Vector Gas C/ Beca Ltd PO Box 3942 Wellington Hywel Edwards	S145	Support	Provide a mechanism for industry representation, including infrastructure providers, to be involved in the whitua committees especially in the context of regulatory mechanisms e.g. the development/progression of plan changes.	FANZ supports the representation of industry groups including primary industry on the whitua committees to ensure proposed rules are workable.	Accept the submission in full.
Porirua City Council Harriet Shelton PO Box 50218 Porirua	S163	Support in part	Schedule F5 Add the following to the second paragraph under descriptor: 'Seagrass is also vulnerable to high levels of nutrients, particularly nitrogen'.	Whilst there is some research that supports this statement, there is also research that states the effects of nutrients on seagrass are uncertain	If the submission is accepted amend to read: Seagrass <del>is</del> <u>may</u> also <u>be</u> vulnerable to

				and it may depend on the species.	high levels of nutrients, particularly nitrogen'.
D.A.Neal Taki Taki 1791 Whangaehu Valley Rd RD6 Masterton 5886.	S278	Oppose	Logic would suggest incorporating the following into the plan: A) Set targets in bands to allow natural variability in measurements e.g. after major floods. B) Study measurements to pick trends (up, down or stable) and prioritise resources to those trends. C) Review targets on a regular basis to ensure relevance to current science and incorporate mechanism in the plan to change those targets.	FANZ is sympathetic to the intent of the submission to manage Periphyton levels that are set using 'imperfect science'. However, FANZ is concerned as to how the band of targets would be determined and implemented in practice. FANZ is also concerned about the lack of certainty provided to land users if targets are reviewed and amended on a regular basis.	Accept the intent of the submission in so far as it seeks to manage natural variability in Periphyton levels, and manage activities according to improved science. Oppose regular review and regular changes to targets.
Rangitāne Tū Mai Rā Trust and Rangitāne o Wairarapa Inc. 12 Kokiri Place PO Box 354 Masterton 5810 Horipo Rimene.	S279	Oppose	1.4 Integrated Catchment Management  Include a comprehensive list of known values of water by adding to Table 1.1) and amend the objectives, policies and other provisions of the Plan to align with achieving outcomes that will provide for those values.	FANZ notes Table 1.1 sets high level values, and the submitter's concerns that the Council has not comprehensively identified the values as part of developing the Proposed Plan. FANZ considers that the Plan as currently proposed gives effect to the values through the objectives, policies and methods in the Plan. Integrated management must accurately interpret and provide for the values with guidance provided to the Whaitua Committees in setting targets. Any values that are added to Table 1.1 and consequential amendments to objectives	Oppose the submission in so far as it seeks that the Plan identifies a list of values in addition to those in Table 1.1. Support is given to interpretation of values or an additional table providing a refinement of these values with full stakeholder engagement that would guide the Whaitua Committees in setting targets and assist in achieving the integrated management approach identified in the Proposed Plan.

				policies and any other provision in the plan will require further, full stakeholder engagement.	
		Oppose	New policy and associated rules that direct how freshwater quality will be maintained in a state at least as good as it was at the time the review of the regional plan was initiated. This policy should be directive in terms of managing both point source and diffuse contributions of contaminants to water.	The Plan as notified already contains policies and rules that are intended to maintain and improve water quality.	Reject the submission in full.
Horticulture NZ PO Box 10 232 Wellington	S307	Support in part	New Objective in 3.1 <u>Natural and physical resources are managed to provide an appropriate balance across values and uses in a catchment.</u>	FANZ understands the submission to be seeking to balance consideration of uses and values. FANZ supports this approach as it is important that values are not always protected to the detriment of economic uses.	Amend the proposed objective as follows:  Natural and physical resources are managed to provide an appropriate balance <del>across of maintaining and protecting</del> values and <u>providing for</u> uses in a catchment.
		Support	Rule R82. Amend Rule R82 to add the following new clause: <u>The applications will be undertaken using good management practices to minimise the potential for wind drift having regard to the Code of Practice for Nutrient Management (Fertiliser Association).</u>	FANZ supports the more practical approach to managing wind drift. This could be expanded to include The Code of Practice for Placement of Fertiliser in New Zealand (otherwise known as The Spreadmark Code of Practice)	Accept the submission and expand to include The Code of Practice for Placement of Fertiliser in New Zealand (otherwise known as The Spreadmark Code of Practice).
		Support	New Method Development of good management practices <u>The Council will work with industries and relevant stakeholders to develop good management practices that provide for</u>	FANZ supports a collaborative approach to developing good management practices.	Accept the submission in full.

			<u>robust and reasonable tools to manage activities regulated through the Plan.</u>		
Wellington Fish and Game Council PO Box 1325 Palmerston North 4440 Attention: Phil Teal.	S308	Oppose	Include a definition of 'natural productive capability of land and soils: <u>'An allocation based on the productive capacity of the land including soil type, slope and rainfall. It is tied to the land rather than existing land uses. The Natural Capital based allocation is the most economically efficient allocation approach and provides the greatest nutrient loss to the elite soils that will produce the most per kg of N loss/Ha/yr.'</u>	Natural capital based allocation is an alternative approach to the allocation regime proposed in the PWNRP. FANZ considers that such an approach would require substantial changes to the provisions of the proposed Natural Resources Plan for Greater Wellington Region. The changes may be so different as to require re-notification of parts of the Plan.	Reject the submission in full
		Oppose	Include objectives, policies and standards and where applicable rules which recognise and protect regional sports fish and gamebird populations and their habitats, and which recognise and provide for recreational hunting and angling.	FANZ is concerned as to the extent and implications of any such objectives, policies and standards. Furthermore the Plan provisions seek to maintain, enhance and manage water quality, thereby ensuring water quality that is capable of supporting recreational use and providing habitats. FANZ also suggests that once drafted, any such additions would need to be publicly notified.	Reject the submission in full.
		Oppose	Amend Objective 023 or include new objective as follows: <u>Water quality of aquifers, lakes, rivers, natural wetlands and coastal water is managed to ensure that:</u> 1. <u>Water quality is maintained where the existing water quality is at a level</u>	The intent of the submission is provided for through the notified provisions and amendments sought by FANZ.	Reject the submission in full.

			<p><u>sufficient to support the values of freshwater (listed)</u></p> <p>2. <u>Water quality is restored where the existing water quality is not at a level sufficient to support the values of freshwater (listed)]</u></p> <p>3. <u>Accelerated eutrophication and sedimentation of waterbodies in the region is prevented.</u></p> <p>4. <u>The special values of waterbodies protected by water conservation orders are maintained or where degraded are restored.</u></p>		
		Support in part	<p>Section 3.5 and 3.6</p> <p>Add a new objective as follows:  <u>The quality and quantity of groundwater is managed through land use provisions and rules to ensure that groundwater continues to provide a sustainable source of high quality water, and surface flow recharge, to protect the life supporting capacity, ecological health and cultural and recreational values of freshwater bodies.</u></p> <p><u>Amend table 3.6 to delete the narrative in relation to nitrate levels and replace with numerical states for acceptable groundwater drinking concentrations, and insert requirements to maintain water quality and quantity, and where degraded such that the ecosystem health of connected surface waterbodies is impacted, groundwater quality and quantity is improved.</u></p>	<p>FANZ supports the inclusion of a specific objective on groundwater quality as long as this is balanced with the consideration of use for economic activities.</p> <p>FANZ also supports the introduction of numerical states in Table 3.6 for nitrate levels in water as long as these are practicable and enable the use of land for primary production. FANZ presumes that such values would be subject to an s32 analysis.</p> <p>In general, FANZ supports numeric values as they provide a level of certainty that narrative statements do not.</p>	<p>Accept the submission to introduce a new objective as long as it is balanced with the ability to use groundwater and enables primary production land uses.</p> <p>Also accept the introduction of numeric nitrate levels in Table 3.6 as long as this is undertaken in consultation with all relevant parties and subject to analysis under s32.</p>
		Support in part	<p>Section 5.4</p> <p>Include new rules which ensure that</p>	<p>Bullet point one: FANZ is concerned that this is a substantial change from the</p>	<p>Accept the submission in part.</p>

		<ul style="list-style-type: none"> <li>• <u>farming activities comply with a sustainable nitrogen leaching rate which is based on allocating the total allowable load of nitrogen for the sub catchments, water management zone or catchment to the land on the basis of either a flat per hectare allocation of nitrogen leaching, or a nitrogen leaching allowance per hectare based on an allocation on a land use capability class basis or some other methodology, which achieves the efficient use of natural resources.</u></li> <li>• <u>require farms to comply with specified management practices which minimise or reduce the loss of nitrogen, Phosphorus, sediment and faecal contamination including, but not limited to, the requirement to seal effluent ponds and to practice deferred irrigation, good management practices for the application of fertiliser and other nutrient sources including setbacks from waterbodies, permanent fencing and planting of riparian margins, good management practices for earthworks and cultivation including setbacks from waterbodies to avoid or minimise sediment run off to water.</u></li> <li>• <u>nutrient budgets are to be prepared annually by a person who has completed both the "Intermediate" and the "Advanced" courses in "Sustainable Nutrient Management in New Zealand Agriculture" conducted</u></li> </ul>	<p>approach to nutrient management in the PWNRP. It would have significant practical implications for land users.</p> <p>Bullet point two: FANZ supports the application of Industry Agreed Good Management Practices.</p> <p>Bullet point three: Where nutrient budgets are required for regulatory purposes, FANZ supports these being prepared by a Certified Nutrient Management Adviser, but opposes nutrient budgets being prepared annually as they should be valid for 3 years unless there has been a change to the farm system.</p> <p>Bullet point five: To apply a prohibited status is very stringent and does not recognise the possibility of changes in N and P concentrations in water bodies as well as the ability to manage such losses by way of industry agreed good management practice.</p> <p>Bullet point six: FANZ understands that there is some anxiety around nutrient trading in the farming</p>	<p>FANZ opposes bullet points one, three (in particular the annual preparation of farm management plans) and five.</p> <p>FANZ supports the use of Industry Agreed Good Management Practices (bullet point two), nutrient budgets being prepared by Certified Nutrient Management Advisors (bullet point three) and has an interest in nutrient trading, recognising it as a future option subject to the need to address a number of technical requirements (bullet point six).</p> <p>FANZ also supports in part the allocation principals identified in Appendix 11 of the submission but suggests caution in the application of natural capital allocation.</p>
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			<p><u>by Massey. University and provided to the regional council. The information shall be provided in an electronic format compatible with regional councils information Systems and may include but shall not be limited to the following report from Overseer or their equivalent iff an alternative model is used (must be accredited for use by the regional council): Nutrient Budget Nitrogen, Phosphorus, Summary, Nitrogen Overview</u></p> <ul style="list-style-type: none"> <li>• <u>exclude all livestock from rivers, lakes and wetlands and to culvert or bridge all regular stock crossings.</u></li> <li>• <u>provide for consent applications for new or intensified (a use that increases loss of nitrogen or phosphorus) use of production in sub catchments that are currently over allocated for nitrogen or phosphorus to be a prohibited activity.</u></li> <li>• <u>Provide for trading of nitrogen or phosphorus loss rates between production land uses or properties in the same sub catchment so long as the nutrient load and the freshwater objectives in tables 3.4 and 3.4a, 3.5 and 3.6, and the limits/ standards are not breached at any point within that sub catchment1 or water management unit.</u></li> </ul>	<p>community that is likely being compounded by on-going changes in OVERSEER outputs as new versions are released and by uncertainty in catchment modelling. However FANZ acknowledges that some form of trading is likely in the future.</p> <p>FANZ supports the use of Farm Management Plans, noting that Appendix 10 is cut and paste from the Canterbury Land and Water Plan.</p> <p>FANZ supports the intent of the allocation principals in Appendix11 noting Beef and Lamb's support for the natural capital based allocation approach. As noted previously, this approach would require substantial changes to the proposed Natural Resources Plan for Greater Wellington Region. The changes may be so different as to require re-notification of parts of the Plan.</p>	
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			<ul style="list-style-type: none"> <li>• <u>Ensure that the rules include both land use and ancillary discharge provisions (section 9 and section 15 RMA).</u></li> <li>• <u>Ensure that rules do not breach s70 RMA and apply sound planning principals.</u></li> <li>• <u>The following numerical limits/ targets for Nitrogen leaching are provided as an indication of the sort of LUC numbers that are intended to be applied. LUC numbers may be amended to be Sub-catchment specific in order to 1) maintain water quality where it currently meets the freshwater objectives or 2) improve water quality so that the freshwater objectives are achieved by 2030.....</u></li> </ul> <p><u>Include Farm environment management plans and good management practice standards as shown indicatively in appendix 10 to this submission.</u></p> <p><u>Apply the allocation principals from Beef and Lamb as set out in appendix 11 to this submission</u></p>		
Beef + Lamb New Zealand Ltd Victoria Lamb Senior Environmental Policy Advisor PO Box 121 Wellington	S311	Support in part	<p>Insert New Policy</p> <p><b>Nutrient Allocation Framework</b> <u>The following principles should apply across the catchment in the determination of nutrient allocation allowances.</u></p> <p><u>Principal 1 Like land should be treated the same.</u></p>	FANZ supports the intent of the principals and considers that they could aid the development of provisions under the Whaitua Committees as well as implementation of the Plan. They provide a clear overarching direction for the Proposed NRP but FANZ	Accept the submission in part, reflecting FANZ's caution with natural capital allocation requiring wide stakeholder engagement.

		<p><u>Principle 2 Those undertaking activities that have caused water quality problems should be required to improve their management to meet water quality limits.</u></p> <p><u>Principle 3 Flexibility of land use must be maintained.</u></p> <p><u>Principle 4 The allocation system should be technically feasible, simple to operate and understandable.</u></p> <p><u>Principle 5 The natural capital of soils should be the primary consideration when establishing an allocation mechanism for nutrient loss.</u></p> <p><u>Principle 6 Allocation approaches should provide for adaptive management and new farm systems information.</u></p> <p><u>Principle 7 Appropriate time frames must be set to allow for transition from current state to one where allocation of nutrients applies.</u></p> <p><u>Principle 8 Long term investment certainty is a critical feature of a viable nutrient management system.</u></p> <p><u>Principle 9 Improvement in water quality must remain the primary objective of adopting any nutrient allocation regime.</u></p> <p><u>Principle 10 In under-allocated catchments, where property based nutrient allocation has not been adopted in setting water quality limits, the system for allocating nutrients must be</u></p>	<p>again expresses caution over the use of the natural capital based allocation approach which will require wide stakeholder engagement.</p>	
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			<p><u>determined well before the limit is reached, be clear and easy to understand and designed to avoid over-allocation.</u></p> <p><u>Principle 11 In designing the allocation system the benefits of a nutrient transfer system within the catchment or water management unit must be considered.</u></p> <p><u>Principle 12 Regulation, monitoring, auditing and reporting of nutrients within an allocation regime needs to relate to the degree of environmental impact and pressure.</u></p> <p><u>Principle 13 As a minimum expectation, in all catchments, all land users should be at or moving towards (industry defined) Good Management Practice (GMP) recognising that GMP is constantly evolving and continuous improvement is inherent in GMP.</u></p> <p><u>Principle 14 Nutrient allocation must be informed by sound science and stable and reliable catchment and farm system modelling and measurement.</u></p> <p><u>Note: These principles and the narrative behind them are appended.</u></p>		
Dairy NZ and Fonterra Co-Operative Group Limited Oliver Parsons PO Box 10002 Wellington 6143	S316	Support	<p>Policy P71 Quality of discharges</p> <p>Insert a new policy to guide Whaitua Committees in the development of nutrient management provisions for their respective Whaitua for both point source and non-point source discharges.</p> <p>Amend Method M27 as follows:</p>	FANZ supports this submission as it seeks to aide implementation of the Plan.	Accept the submission in full.

			<p>“Wellington Regional Council will develop <u>a framework to assist Whaitua Committees and implement a programme</u> to improve water quality for contact recreation and Māori customary use in the first priority fresh and coastal water bodies identified in Schedule H1.</p>		
<p>Federated Farmers Elizabeth McGruddy PO Box 715 Wellington 6140</p>	<p>S352</p>	<p>Support in part</p>	<p>Add a new Policy - <b>primary production</b> as follows:</p> <p><u>The benefits of primary production, manufacturing, distribution and processing are recognised and provided for by:</u></p> <p><u>(a) Recognising existing land uses and investments, including capital and operational investments in sustainable farming practices and environmental stewardship</u></p> <p><u>(b) Supporting the ongoing use and development of land, recognising the need for flexibility to respond to seasonal fluctuations and changing markets</u></p> <p><u>(c) Providing for any requirements for significant new capital investments to be made only in the context of robust cost-benefit analysis</u></p> <p><u>(d) Providing transition times to meet new requirements or catchment limits</u></p> <p><u>(e) Working alongside industry and landowner/catchment groups to support the ongoing development of sustainable farming systems, and to enable collective or cross-catchment solutions to meet objectives</u></p>	<p>FANZ supports the intent of the submission to provide for the benefits of primary production.</p>	<p>Accept the submission in part: clauses (a), (b), (e) and (d) in so far as it provides for transition times. FANZ does not support or oppose clause (c).</p>
		<p>Support in part</p>	<p>Add a new Policy - <b>Land and Water Management Framework</b> as follows:</p>	<p>FANZ supports the collaborative intent of the policy in reducing lowland nitrogen leaching losses to</p>	<p>Accept those parts of the submission that are of particular relevance to FANZ:</p>

		<p><u>WRC will work with territorial authorities and industry to address priorities identified in the pNRP and Whaitua Implementation Plans, including:</u></p> <p>a) <u>prioritise catchments for coordinated community action</u>  - including indicative priorities in M8, M9 and M12.</p> <p>b) <u>prioritise key pressures and sources, including</u>  - <u>supporting industry/landowner initiatives to reduce hill country erosion and sediment losses, particularly during high-flow events.</u>  - <u>supporting industry/landowner initiatives to reduce lowland nitrogen leaching losses to groundwater.</u>  - <u>supporting territorial authority initiatives to reduce phosphorous discharges to surface water, particularly during summer low-flows.</u></p> <p>c) <u>prioritise effective and cost-effective management interventions</u>  - <u>informed by expanded research and monitoring, including through M2 and M10.</u></p>	<p>groundwater and phosphorus flows to surface water.</p>	<p>being clause b) points 2 and 3.</p>
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