

Submitter ID:

File No:

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

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

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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

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Elizabeth McGruddy

ORGANISATION (* the organisation that this submission is made on behalf of)

Federated Farmers

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

Email preferred

PHONE

027 217 6732

FAX

EMAIL

emcgruddy@fedfarm.org.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

original submitter

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature: E McGruddy

Date: 29/3/2016

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

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.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Name of person/ group making original submission and postal address.	The original submission number can be found on the submitter address list.	Whether you support or oppose the submission.	Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions.	Why you support or oppose each submission point.	The part or whole of each submission point you wish to be allowed or disallowed.
<i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood	<i>e.g.</i> submitter S102	<i>e.g.</i> Oppose	<i>e.g.</i> Oppose all of submission point S102/41	<i>e.g.</i> The submission point does not recognise...	<i>e.g.</i> Disallow the parts of S102/41 relating to...
Kahungunu ki Wairarapa	S300	support	Encouraging greater detail around mahinga kai and maori cultural uses, including within the whitua committees	More detail can support mutual understanding and open up avenues for achieving win-win outcomes	More detail on mahinga kai, maori cultural uses and mana whenua values in Schedule C
		support	More consideration to blue and green infrastructure, including strengthening methods for this purpose	Consistent with our primary submission	Suggest this concept could be included in M12
Rangitane o Wairarapa	S279	Oppose	Whole plan: resource limits should be specified in the plan now including because whitua timeframes and outcomes are not certain, and council should not allow water bodies to	The submitter has perhaps not appreciated that water quality is stable across the region: we have made recommendations that this important context be beefed up in Chapter One.	Reject submission. Make amendments to chapter one as recommended in our primary submission.

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			decline in the meantime	<p>We also made recommendations on Chapter one to elaborate the requirements of the NPS including that the NPS recognises the importance of quality rather than quick fixes; and that decisions about objectives or limits will be an iterative process, fully informed by costs and achievability.</p> <p>We support the whitua process wherein committees will consider all the values that are relevant to setting objectives and limits, with a full set of relevant catchment evidence; and with improvement efforts tailored in accordance with the issues, values and economic constraints of each catchment.</p> <p>Any proposals to set regional limits in the pNRP would need to be supported by comprehensive regional information and iterative cost-benefit analysis – a process likely to take at least as long as getting the job done in the whitua.</p>	
		Support	1.4 extend Table 1.1 values	<p>As set out in our original submission re Table 1.1.</p> <p>Each and all values should receive appropriate region-specific description to assist expression of objectives and – more importantly – to assist in arriving at agreed balances across values and uses.</p>	Expand Table 1.1 values.

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		Oppose	Extend definition of Wairarapa moana	Submitter has not provided reason, nor intended application	Retain existing definition.
		oppose	O11 expand beyond customary use	Need to clarify application relative to landowners property rights and use and enjoyment of their land	
		oppose	O14 expand to describe maori relationships and how provided for	As set in our primary submission regarding sites of significance	
		oppose	O16 expand to direct protection of schedule B sites	As set out in our primary submission. Acknowledging the significance of schedule B sites for iwi, these river systems are also significant for other sectors of the community across a range of values. The primary task for the pNRP and whitua is to arrive at an agreed balance across values to achieve the primary purpose of the RMA.	Reject submission.
		oppose	O23 extend, including to include artificial waterbodies	Inconsistent with RMA	Reject submission
		support	O23 maintain water quality as per time at which plan review was initiated	For clarity	
		Oppose in part	O23 state timeline for achieving	O23 is too generic for timelines. More sensibly priority places would be indicated in the pNRP objectives and strategies/timelines developed in the whitua as recommended in our original submission	

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
		oppose	O24 all waterbodies swimmable by 2030	<p>For reasons set out in original submission and as above.</p> <p>The pNRP appropriately signals priorities for whaitua attention - principally the sandy beaches and stony-bottom rivers with public access which are the known popular swimming areas – and which may be extended to other waterbodies prioritised for swimming within the whaitua.</p> <p>Timeframes should be set by whaitua, informed by whaitua priorities and supported by whaitua-specific understanding of key issues impacting on swimmability (eg, flood flows, willows, access); the practicalities and costs of achievement; and any balancing of values needed (eg, ducks upstream of swimming holes).</p>	Reject submission
		oppose	O25 changes to mahinga kai, achievement by 2030, deletion of the note specifying that whaitua objectives take precedence	For reasons set out in original submission and as above.	<p>Reject submission.</p> <p>Retain statement clarifying that whaitua-specific objectives take precedence over generic regional objectives.</p>
		Oppose in part	O31 identify outstanding, including Ruamahanga and tributaries.	<p>Support identification as set out in our original submission on Method M7.</p> <p>Oppose identifying selected waterbodies in advance of a formal process and public engagement</p>	

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
		oppose	O45 amend stock access provisions to emphasise “avoid”	<p>Mandatory stock exclusion is not the panacea for safeguarding indigenous species or improving swimming.</p> <p>Consistent with our primary submission – and consistent with points made by Rangitane elsewhere in their submission – we need to keep our focus on the values we want to support, identify the key issues impacting, and then align our collective efforts to achieve them, preferably in an efficient and targeted manner.</p> <p>We reiterate the importance of reliable access to water for stock.</p>	Reject submission
		Oppose in part	O46 amend to specify objectives and limits to be achieved	<p>Support intent to achieve more practical linkage between objectives and methods/rules.</p> <p>In our original submission, we have recommended the pNRP objectives identify named priorities for whitua attention, ie, intended to achieve a similar result.</p>	Amend generic pNRP objectives to more clearly identify priorities for whitua attention
		oppose	O47 amend to specify objectives and limits to be achieved	Support intent but propose alternative relief as for above point.	
		oppose	New objective O52A imposing conditions on use of water including avoiding adverse effects on Schedule B rivers	<p>For reasons set out in original submission and above.</p> <p>Several components appear to be repetitions of existing provisions.</p>	

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
		Support in part	P1 provide for decision-making at catchment or sub-catchment scale as appropriate	As set out in our primary submission; we strongly support catchment and sub-catchment communities being enabled to take ownership.	Adopt relief sought in FFNZ primary submission for amendments to O5, O25, O26, O35, O44, P1, P3, new policy research and monitoring, P4, P40, P42, new policy land and water management framework, P65, P96, M9, M10, M12 and M27
		Support in part	P8 recognise and provide for beneficial activities	As stated by submitter, and consistent with our primary submission.	
		support	P9 temporary restrictions to coastal access, eg, for stock movements	As stated by submitter, ie, drafting error	
		Oppose in part	P17 expand policy for mauri, including by “not allowing” activities, and enabling participation of kaitiaki in consent processes and in schedule C sites and Schedule B waterways	<p>As stated by submitter, the pNRP should use RMA terminology.</p> <p>As set out in our primary submission, we support the pNRP providing a positive framework for positive working relationships to appropriately respect and balance multiple uses and values.</p> <p>Policy should principally be made in the plan, rather than devolving to consent processes, at the cost of applicants.</p>	Retain P17 as written
		Oppose in part	P18, amend policy for Nga taonga nui a kiwa sites to be more directive to protect iwi values, and delete “redundant’ note regarding whaitua consideration	Support parts of P18 re iwi restoration initiatives and kaupapa maori monitoring – we would welcome opportunities to be involved in extended iwi/landowner/community monitoring and restoration initiatives.	<p>Retain as written.</p> <p>Retain the whaitua note.</p>

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				As in our primary submission and above, we do not support one sector or value set taking precedence over others – the real task in front of us is arriving at a balance which gives respect to all.	
		Oppose in part	P19, amend to direct that effects on maori values be avoided, not minimised	Support submitters reservation with the work “minimise’ but reject their alternate of “avoid”.	Amend P19 to read: the cultural relationship of maori with air, land and water shall be recognised and the adverse effects on this relationship and their values shall be minimised
		Oppose in part	P46, amend schedule E to include mana whenua archaeological sites, and protect via rules	We support identification of scheduled sites based on clear criteria, robust evidence, and clear mapping. We do not support extending the pNRP rules to further sites, for the reasons set out in our primary submission re Schedule C sites.	
		oppose	P50, amend to avoid all effects on significant geological features in the coastal marine area	Schedule J presents a hierarchy of significance. It is not appropriate to apply blanket prohibitions.	Retain as written or amend consistent with relief sought in our primary submission on P48
		Oppose in part	Add new policy directing how water quality will be maintained	Water quality is already stable across the region, not least due to significant industry, council and partnership investments over recent years; and supported by the operative rule framework at both RC and DC level. Rather than introduce a new policy, our primary submission recommended that this important	Expand chapter one description of current state and trends. Expand chapter one description of current/planned industry, council and partnership programmes. Expand chapter one description of the relevant current operative regulatory framework – Regional Council and District Council.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
				context be expanded in chapter one of the pNRP	Expand chapter one analysis of the extent to which current regulatory and non-regulatory programmes have assisted in maintaining water quality across the region.
		Oppose in part	P65, amend to include more limits, rules and allocation regimes for agriculture otherwise there is no assurance of maintaining current water quality	<p>Agree with the submitter that the pNRP should maintain water quality (while the whitua land objectives for improvement, properly informed by achievability and costs).</p> <p>The assurance that water quality can be maintained within the current operating framework is demonstrated by the GWRC state and trend data showing that water quality is stable (if not improving in historic hotspot areas).</p> <p>The more important conversation is about aspirations for improvement and how we can collectively align our efforts to achieve that – principally through the well-established industry/council partnership programmes. We have recommended that these programmes be expanded to include iwi and other community partners within priority catchments or sub-catchments.</p>	<p>Expand chapter one description of current state and trends.</p> <p>Expand chapter one description of current/planned industry, council and partnership programmes.</p> <p>Expand chapter one description of the relevant current operative regulatory framework – Regional Council and District Council.</p> <p>Expand chapter one analysis of the extent to which current regulatory and non-regulatory programmes have assisted in maintaining water quality across the region.</p>
		Support in part	P94, policy for animal effluent, including that it should be linked to outcomes for freshwater, relative to other activities.	All animal effluent in the region is applied to land; we agree that this contribution to achieving water quality outcomes should be recognised.	Cost-benefit analysis of storage costs for animal effluent.

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				We agree also that the relative risks of effluent run-off from land need to be appropriately assessed alongside other activities: a key recommendation in our primary submission is that the costs of pond storage (regularly in excess of \$100,000 or up to \$400,000) need robust cost-benefit analysis.	
		Support in part	P96, recommending deletion of policy for managing of rural land use in favour of a new suite of policies and rules.	We agree with the submitter that the policy as currently drafted is a bit lightweight: we have made recommendations for beefing it up in our primary submission.	Reject submission. Adopt relief sought in FFNZ primary submission.
		Support in part	P97 and P98 re more clarity on managing sediment discharges	We recommended changes to prioritise significant sources/risks	Adopt relief sought in FFNZ primary submission.
		Oppose	P100, re stock access seeking to emphasise “avoid”, to prioritise smaller tributaries and extend exclusion to sites scheduled in A-F and H	FFNZ do not support blanket stock exclusion requirements un-informed by robust cost-benefit analysis; and heedless of stock need for reliable access to drinking water.	Adopt relief sought in FFNZ primary submission.
		oppose	P102, re avoiding reclamation/drainage, seeking no exemptions for sites in schedules A-F	In their current form, there aren't many waterways left outside of those schedules. Provision should be made for erosion and flood control works.	Reject submission
		oppose	New policy after P128, seeking that resource consent decisions on water and land use and	Objectives can be achieved without creating a bureaucratic nightmare	Reject the submission

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			discharges all be considered together		
		Support in part	Proposed new catch-all discretionary rule for other discharges to water	R68 addresses this concern but should be amended to clarify application to discharges to water	Amend R68 to read: the discharge of water or contaminants into water, or onto or into land where it may enter water
		Support in part	R79 and R80 re treated wastewater to land	Support point re consideration of freshwater objectives and limits, noting that land application of treated wastewater or farm effluent to land will assist achievement.	
		Oppose in part	5.5.2 wetlands general conditions, add condition for exclusion of stock from all wetlands, including natural wetlands	FFNZ do not support blanket stock exclusion requirements un-informed by robust cost-benefit analysis, including in the case of natural wetlands. It is our understanding that stock access to wetlands may in fact be beneficial in some cases, eg, to maintain threatened plant populations, or to maintain nutrient stripping capability.	Reject submission
		oppose	R115, culverts, requiring consent for culverts in schedule F sites to protect indigenous fauna	We seek an enabling framework for culverts, for the same reason.	Reject submission.
		oppose	R133 and R134, seeking to make the taking of water from Lake Wairarapa (and other lakes) non-complying	No reason or evidence is presented as to detrimental effects of the longstanding use of water from Lake Wairarapa	Reject submission

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		Support in part	New schedules for outstanding landscape, features, character	Method M7 addresses this point	Adopt relief recommended in FFNZ submission on M7
Atiawa ki Whakarongotai	S398	Support	Separate ecosystem health and mahinga kai	<p>For reasons set out by submitter.</p> <p>We too have struggled to understand why these are presented together in the pNRP.</p> <p>We have the same question re contact recreation and customary use.</p>	Distinguish ecosystem health/mahinga kai and contact recreation/customary use as separate values and objectives.
		Oppose in part	Whaitua committees not supported, including because they do not have sufficient iwi representation, because of failings in the modelling project, and because GWRC should not devolve or delay decision-making.	<p>We share the submitters concerns about the modelling project at this stage, possibly for different reasons.</p> <p>We oppose the suggestion of majority representation by iwi (or 50% as proposed by submitter S309).</p> <p>We support the pNRP being structured to overall maintain current state, while devolving catchment-specific decision-making about improvements which respect and reconcile multiple community values, to the whaitua.</p>	
		support	Where practical, the plan should indicate timeframes within which objectives will be delivered	This would be consistent with our recommendations for tightening up generic objectives, eg, to indicate priority catchments/species etc	

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
		oppose	O15, reword to reflect treaty obligation of council	More clarity needed on intent and application: does the submitter seek sovereignty?	
		Support in part	Table 3.1, add additional parameters	We generally support the approach taken to present integrative biological parameters in the pNRP (MCI, periphyton); while reserving further analysis of other attributes to the whaitua, with an expectation that these will be prioritised to key factors impacting on values.	Reject submission. Alternatively, the pNRP could describe current state across the various parameters and indicate priorities for whaitua attention, consistent with the approach for contact recreation.
		Support in part	P20, make provision for Kaitiaki group that provides input into the policy and science operations of council.	This is consistent with council partnership intent and would be strengthened with a similar group representing landowners.	Develop new method that provides for kaitiaki and landowner input into policy and science operations of council.
		Support in part	New method to identify priorities for monitoring	Support the intent. Perhaps an existing method could be extended to incorporate this concept.	
		Support in part	Extend M28 re development of good management practices to include practices and procedures for a partnered approach to decision-making with mana whenua	This concept would be stronger if it is more inclusive, ie, practices and procedures for a partnered approach between council, mana whenua, landowners and community.	

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Nga Hapu o Otaki	S309	Oppose in part	P44 and P45, add schedule B sites	<p>Support addition to P45 subject to changes recommended in our primary submission.</p> <p>Do not support addition to P46: we recommended deleting it, for reasons set in our primary submission.</p>	
		Support in part	M6, implementing the NPS, seeking the involvement of mana whenua	This is consistent with council collaborative intent and would be strengthened with a similar involvement from landowners.	
Fish & Game	S308	Support in part	<p>Background, including material distinguishing F&G responsibilities for species from council responsibilities for habitats.</p> <p>The material includes a claim: "it is recognised" that trout habitat requirements provide protection for the health of other species.</p> <p>Another statement suggests there are 2.3% of wetlands left in the Greater Wellington region.</p>	<p>Support inclusion of some of this material in Table 1.1, expanding on the recreational fishing value.</p> <p>Reject the claim regarding trout habitat requirements. The key point is that native species and trout have different habitat requirements.</p> <p>This statement also glosses over the role trout play as competitors and predators within NZs aquatic ecosystems.</p> <p>The estimate of 2.3% of wetlands was made in respect of the Wellington biogeographic region, which includes the Manawatu. To our knowledge there is no estimate available for the Greater Wellington region.</p>	

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		Support in part	General submission section, specifically that the pNRP ensures water quality is at a minimum maintained, and where degraded is improved.	We support the pNRP providing first for maintenance; and secondly for the identification and prioritisation of 'hotspots'	
		Support in part	<p>The councils s32 evaluation is flawed.</p> <p>S32 analysis should be undertaken of farming rules (35.34)</p>	<p>We agree, possibly for different reasons.</p> <p>The answer for both of us is preparation of more robust s32 analyses, preferably before the hearing to support pre-hearing mediations and formal hearing deliberations.</p> <p>We specifically agree on the requirement for robust s32 analysis of farming rules, including major capital expenditure items (stock exclusion, pond storage, silage sealing); and analysis of the sum of the proposed restrictions across the farming sector and across the region.</p>	<p>More robust s32 reports be prepared before the hearing including:</p> <ul style="list-style-type: none"> • Cost-benefit analysis of the sum of the proposed costs and restrictions on farming at regional scale • Cost-benefit analysis of the sum of proposed costs and restrictions in designated areas, including Wairarapa Moana and drinking water protection zones • Cost-benefit analysis of major capital items including livestock exclusion and effluent ponds • Cost-benefit analysis of the schedules and the sum of their proposed restrictions vis-à-vis alternate non-regulatory options for prioritising and managing significant sites • Cost-benefit analysis of the proposed water quality objectives, including numeric and narrative objectives in Tables 3.1-3.8 • Cost-benefit analysis of the proposed water allocation provisions, including analysis of reliability and financial implications for irrigators

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		Support	<p>NPS Freshwater: It is not appropriate for the Council to defer giving effect to the NPS on the basis that whitua chapters are yet to be developed.</p> <p>The plan should give effect to the NPS using interim measures, and if those measures need to be amended during the development of the whitua sections, that is able to be achieved while maintaining consistency with the NPS.</p>	<p>We agree and that is exactly our understanding of the NPS Implementation Programme that Council are following.</p> <p>The pNRP sets up a region-wide framework, within which whitua chapters are being developed.</p> <p>As above, we agree with F&G that the pNRP should establish a framework for maintenance; while indicating priorities for whitua attention.</p> <p>The task of landing objectives for improvement, supported by limits and other methods, properly belongs with whitua, properly informed by catchment-specific values, evidence and cost-benefit analysis.</p>	
		Support in part	Include other parameters relevant to freshwater values (35.5)	We generally support the approach taken in the pNRP to present integrative biological parameters in the pNRP (MCI, periphyton); while reserving further analysis of other attributes to the whitua, with an expectation that these will be prioritised to key factors impacting on values.	<p>Reject submission.</p> <p>Alternatively, the pNRP could describe current state across the various parameters and indicate priorities for whitua attention, consistent with the approach for contact recreation.</p>
		oppose	Include new table 3.4a establishing freshwater objectives for trout (35.9)	<p>Objectives for safeguarding indigenous species should generally serve to also maintain habitat for introduced species.</p> <p>Our current understanding is that</p>	<p>Reject submission</p> <p>Alternatively, provide evidence of specific areas where specific water quality attributes are compromising trout populations - these might appropriately be</p>

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				<p>the regions trout populations are in a relatively healthy state, ie, maintenance of existing water quality is appropriate.</p> <p>We have proposed an alternate relief in respect of another submitter that the pNRP could describe current state across various parameters and indicate priorities for whaitua attention, consistent with the approach for contact recreation</p> <p>In this context - if there is evidence of specific areas where water quality attributes are compromising trout populations - these might appropriately be identified as priorities for whaitua attention</p>	identified as priorities for whaitua attention
		Support in part	Schedule Q and other provisions: numerical measures should be included to quantify what is meant by reasonable and efficient (35.14)	<p>Agree in part: numerical measures are also needed for reliability and certainty of supply.</p> <p>Schedule Q includes numerics, but numerical measures should not be exclusively relied on against the risk of unintended consequences as set out in our primary submission.</p>	
		Support in part	<p>Wetlands: that all wetlands are protected as RMA s6 habitats; and that these be restored where degraded.</p> <p>To recognise and provide for their values, including</p>	<p>We oppose classification of all wetlands as significant.</p> <p>We support development of an enabling non-regulatory framework within the pNRP for the restoration or creation of wetland habitat.</p>	

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			game bird values, and to enable the creation of new habitat (35.17)	<p>We support the focus on <i>values</i> of wetlands, consistent with the NPS.</p> <p>We support providing for gamebird habitat, noting that in some cases, this may mean activities which are currently restricted within the rule framework, eg, clearing raupo to create clear swimming area and/or to improve nutrient attenuation values; or planting non-indigenous species, eg, oaks</p>	
		Oppose	Landuse rules should include ancillary discharges (RMA s9 and s15) (35.20)	<p>The submitter needs to clarify reasons.</p> <p>The more important point regarding rules is that they should conform to Treasury principles for best practice regulation, as recommended in our primary submission on 2.1.3</p>	<p>As sought in our primary submission, including that rules should be:</p> <ul style="list-style-type: none"> • Proportional • Flexible • Certain • Growth-supporting
		Oppose	<p>Output based standards such as nitrogen leaching per hectare per annum, are an essential component of second generation plans (35.22)</p> <p>Nitrogen leaching standards should be established based on land use capability or similar (35.28)</p> <p>Nutrient transfer or trading regimes should be established to enable nitrogen reductions to be</p>	<p>They certainly were for second generation plans, probably not for third generation plans.</p> <p>The earlier un-critical adoption of output based “standards” derived from modelled estimates is now being replaced by more critical assessment of the assumptions, gaps and uncertainties inherent in modelled estimates.</p> <p>Of particular relevance in the Wairarapa context is the advice from OVERSEER owners (AgResearch/MPI, 2013) that estimates outside</p>	<p>Reject submission.</p> <p>Adopt relief sought in FFNZ primary submission for amendments to O5, O25, O26, O35, O44, P1, P3, new policy research and monitoring, P4, P40, P42, new policy land and water management framework, P65, P96, M9, M10, M12 and M27</p> <p>Expand chapter one scientific/technical context to record limitations of using OVERSEER beyond its intended use, including that estimates outside calibration/validation range need to be considered extremely cautiously including:</p>

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			<p>achieved at least cost and to enable maximum flexibility to enable economic benefits to be maximised (35.30)</p> <p>Section 3.9 new objective, seeking to regulate all land uses to good management practice and output based standards.</p> <p>New policy after P117 seeking more policies and rules for regulating farming. Section 5.4 also seeking new rules for farming.</p> <p>Section 5.5.4 additionally seeking new rules for farming</p>	<p>calibration/validation range need to be considered extremely cautiously, including shallow soils, irrigated soils, peat soils, clay soils, the cropping sector and the hill country sheep and beef sector.</p> <p>Equally importantly, an increasing body of research – NZ and international – is highlighting the importance of understanding attenuation processes and pathways, against the risk that a lot of money gets spent in areas not well targetted to achieving the actual result in the river.</p> <p>A third critical factor is that Overseer is inevitably always behind the eight-ball on leading edge practice and innovation. It is this that we seek to encourage, not to knee-cap.</p> <p>This last point is relevant to consideration of NDAs and trading regimes. In 2013, a report compiled by Agresearch/NIWA “Assessment of strategies to mitigate the impact or loss of contaminants from agricultural land to fresh water” found that the majority of mitigation strategies assessed in the report are not captured within current models. In plain language: they wouldn’t “count”.</p> <p>Re trading, it is important to recognise that markets do not always live up to their theoretical</p>	<ul style="list-style-type: none"> • shallow soils • irrigated soils • peat soils • clay soils • cropping sector • sheep and beef sector. <p>Expand chapter one to record that the majority of mitigation strategies are not captured within current modelling frameworks; and that the effectiveness of mitigation strategies is strongly context and catchment specific.</p>

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				<p>promise; and that NZ is unique in attempting to develop “cap-and-trade” markets for agriculture.</p> <p>Taupo is the only case study and a recent report (Motu, 2015) found that Taupo fails the conventional market depth and heterogeneity and liquidity tests and has largely failed to deliver on the theoretical advantages of markets:</p> <ul style="list-style-type: none"> • market transactions are extremely clunky and expensive • no new management practices have emerged • only very limited farm-farm trading has occurred, mostly one dairy farmer • ongoing trades depend on high dairy prices <p>For all of the reasons above, Overseer is well-suited as a tool to support farm decision-making and to indicate the direction of travel, but we have recommended amendments to pNRP objectives, policies and methods to provide more effectively for targetted action in priority catchments.</p> <p>Further support for this approach comes from work recently commissioned by MfE (AgResearch/NIWA 2013). In brief, the report found that a number of caveats apply to selecting strategies to achieve good water quality outcomes:</p>	

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				<ul style="list-style-type: none"> • each strategy has a range in price and effectiveness, but both may be significantly improved if placed in the right place and at the right time • using multiple strategies in one location will be less effective than using multiple mitigations along the transport pathway (the treatment train approach). <p>The report focussed on established strategies, ie, published and peer-reviewed; relevant and with data on cost-effectiveness. Importantly, the report found:</p> <ul style="list-style-type: none"> • The majority of strategies outlined in this report are not captured within current modelling frameworks. <p>In addition:</p> <ul style="list-style-type: none"> • The drawback of this approach is exclusion of new but unpublished data, eg, from the synthesis of farm mitigation technologies, and many more in various stages of development that may come on-line in 2-10 years 	
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				<p>In short: developing rules which attempt to prescribe either “output standards” or “good management practice” run the very real risk of undermining the innovation, flexibility, efficiency and targeted action necessary to deliver steady and enduring improvements.</p> <p>Regarding LUC: the Land Use Capability system was developed in the 1970s, and has been used in the Wairarapa to assist in targetting erosion control in hill country</p> <p>More recently it has been used in Horizons and Tukituki plans, linked to nitrogen controls. In this context, the critical link between the LUC model and the OVERSEER model is ‘carrying capacity’.</p> <p>LUC stock carrying capacities – average, top farmer, attainable potential - were developed 30 odd years ago for “typical sheep and beef farming systems” . They have not been updated in the last 30 years and they do not apply to dairy or cropping systems.</p> <p>LUC operates at three levels – class, sub-class, and unit. Stock carrying capacity is estimated at unit level; and erosion plans are</p>	

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				<p>traditionally targetted at unit scale. Significantly at odds with this approach, LUC N controls in Horizons and Tukituki were set at class scale.</p> <p>In the event, the Horizons One Plan LUC numbers have proved problematic for practical implementation.</p>	
		oppose	Landuse and ancillary discharge activities (35.25) are regulated to ensure that good environmental management practices are achieved at a minimum	<p>Regulation is well-suited to proscribing detrimental activities; it is not at all well-suited to prescribing “good management practice”.</p> <p>Attempts to do this almost inevitably run into problems with one-size-fits-all solutions or conditions intended to provide an element of flexibility but equally often giving only uncertainty.</p> <p>For this reason, we support ;</p> <ul style="list-style-type: none"> • clear rules based on evidence and effects with clear and certain conditions as set out in our primary submission on 2.1.3 • development and implementation of good management practices within the non-regulatory industry/council partnership programmes which are already successfully established and delivering in this region. 	Reject submission.

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		oppose	Method M28 seeking to direct one-size-fits-all prescriptions of good management practices.	<p>As set out in our primary submission.</p> <p>M28 needs to be read in the context of other methods for prioritising catchments, developing catchment-specific understanding of key pressures and drivers, and investing in catchment coordination and one-on-one advisory services.</p> <p>A key point is that individual and collective costs can be minimised by efficient targetting and timing along the source-transport-sink pathway.</p>	Reject submission
		oppose	<p>Appendix 5 and 6 allocation status for the Wairarapa based on nitrogen concentrations and loads</p> <p>Appendix 7 and 8, allocation status of the region based on macroinvertebrate community health</p>	<p>The submitter apparently lodged a colour submission but the GWRC website reproduces the schedules in black and white, making it impossible to comment on.</p> <p>The methodology is not stated in either case, again making it impossible to comment or accept the submission.</p> <p>We note that the submitter has not provided appendices for DRP or any other factors, eg, habitat, flow.</p> <p>We make the point that allocation status can only be assessed against limits; which can only be landed after proper iterative</p>	<p>Reject appendices 5-8</p> <p>Adopt relief sought in our primary submission, ie, that explicit analysis of pNRP water quality objectives be undertaken pre-hearing, alongside analysis of alternate objectives (including those proposed by FFNZ).</p> <p>Alternatively, adopt the contact recreation template for safeguarding indigenous species, ie:</p> <ul style="list-style-type: none"> • record current state • identify indicative priorities for whaitua attention

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				analysis of achievability and costs.	
		oppose	Appendix 9 purporting to show relationships between nitrate, DRP and MCI	<p>The submitter has attempted to analyse the proportion of rivers which achieve the pNRP MCI objectives.</p> <p>Apart from river class 1(7% fail), most are a long way off (26%, 49%, 83%, 85%, 93%). This analysis usefully highlights that the pNRP objectives go a long way beyond “maintenance”.</p> <p>It is material in this context that WRC based these objectives on a very convoluted approach which attempted to model what “reference” (pre-human) MCI might have looked like, notwithstanding the almost complete absence of reference sites (except in river class 1and even they were too high first time round before WRC “adjusted” them so that less sites failed).</p> <p>The much more straightforward approach would be to record current MCI, ie, expectation of maintenance. In areas where MCI is less than that required to safeguard the health of indigenous ecosystems, these areas should be named and prioritised for whaitua attention, consistent with the pNRP approach for contact recreation.</p>	<p>Reject appendix 9.</p> <p>Alternatively, require the submitter to provide full details of the data and methodology employed.</p> <p>As per our primary submission, any recommendations for objectives and limits – including and especially objectives which aspire to pre-human conditions – must be subject to rigorous cost-benefit analysis before landing them.</p> <p>The cost-benefit analysis of options should be undertaken prior to the hearing to properly inform decision-making.</p>

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				<p>Appendix 9 goes on to propose nitrate and DRP “limits”: interestingly these are mostly well below ANZECC guidelines for un-modified catchments.</p> <p>Again this usefully highlights that the objective implicit behind the numbers is apparently to return all waterways to a pre-human state.</p> <p>If that indeed be the objective, that should be stated so that it can be debated.</p> <p>As noted above, that objective and any supporting limits, must be subject to robust cost-benefit analysis before landing it.</p> <p>As with Appendices 5-8, the submitter has not provided details of the methodology; nor has the supporting data been tabled.</p>	
Royal Forest & Bird Protection Society	S353	oppose	Table 3.4 and 3.5: including add SIN 0.4 mg/L and DRP 0.01 mg/L as bottomlines for all the regions waterbodies	<p>The submitter is recommending that ANZECC guidelines for un-modified catchments be adopted as bottomlines.</p> <p>This presupposes that our objective is to achieve “pre-human” conditions: if this is so, this objective should be specifically declared.</p>	<p>Reject submission.</p> <p>Retain current WRC approach wherein whaitua are responsible for developing catchment-specific limits informed by catchment-specific values, objectives and cost-benefit analysis.</p> <p>Adopt relief sought in FFNZ primary submission for amendments to O5, O25, O26, O35, O44, P1, P3, new policy</p>

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				<p>This also presumes that the ANZECC guidelines (derived from just three catchments – one in Northland and two in Upper Waikato) are appropriately applied across the full range of waterbodies in the region, be they lowland spring-fed, hill country sedimentary or range-fed stony bottom rivers.</p> <p>Most importantly, the NPS is clear that these or any other objectives for improvement cannot be advanced or landed without robust, reiterative analysis of achievability and costs.</p> <p>In fact, the ANZECC guidelines themselves (ANZECC 2000) recommend exactly this approach, including that:</p> <ul style="list-style-type: none"> • The guidelines are not mandatory, nor should they be regarded as such. The vast range of environments, ecosystem types and food production systems in Australia and NZ require a critically discerning approach to setting water quality objectives. • It is not possible to develop a universal set of specific guidelines. Instead a framework is provided that 	<p>research and monitoring, P4, P40, P42, new policy land and water management framework, P65, P96, M9, M10, M12 and M27</p> <p>Add description of ANZECC Guidelines in Chapter One science/technical context, eg:</p> <ul style="list-style-type: none"> • ANZECC guidelines have moved away from promoting single number guidelines that are applied universally towards guidelines that can be determined individually according to local environmental conditions. Although this may require more work, it will result in more realistic goals for management • The fundamental objective is the sustainable use and management of water resources in an environmental, economic and social context. Integrated catchment management (ICM) is essential to achieving this objective. Within the ICM framework, all stakeholders – landowners and the community in partnership with relevant government agencies – identify values to be protected and formulate specific water quality objectives

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				<p>allows the user to move beyond single-number, necessarily conservative values, to develop site-specific guidelines. This is a key message of the Water Quality Guidelines</p> <ul style="list-style-type: none"> • The guidelines are intended to help managers establish water quality objectives that will maintain ecosystems and meet the needs of people who use a water resource. • ANZECC guidelines have moved away from promoting single number guidelines that are applied universally towards guidelines that can be determined individually according to local environmental conditions. Although this may require more work, it will result in more realistic goals for management • Water managers can use the guidelines to guide practice and formulate policy taking into account local conditions and associated costs and benefits. The result should 	
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				<p>be more efficient and cost-effective environmental management</p> <ul style="list-style-type: none"> • The philosophical approach is this: protect environmental values by meeting management goals that focus on concerns or potential problems. This is in contrast to previous approaches which more often focussed on simple management of individual water quality parameters • Cooperative best management focusses on attaining goals for environmental quality rather than on compliance per se. For example, agreed levels of unacceptable change would be negotiated between all the stakeholders with the overriding objective of attaining the established management goals for a water resource, rather than simply regulating to meet individual water quality parameters. • The environmental values 	
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				<p>and management goals for a particular area need to be well thought out, with full knowledge of the implications to the wider community. This is a process involving broad consultation with representatives of the whole community, with the aim of reaching a desirable, practical and agreed set of management goals, and hence water quality objectives.</p> <ul style="list-style-type: none"> • The fundamental objective is the sustainable use and management of water resources in an environmental, economic and social context. Integrated catchment management (ICM) is essential to achieving this objective. Within the ICM framework, all stakeholders – landowners and the community in partnership with relevant government agencies – identify values to be protected and formulate specific water quality objectives • The guidelines encourage 	
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				<p>industry, government and communities to work cooperatively to maintain or improve the quality of water bodies. Cooperative best management involves a range of tools, eg, memoranda of understanding, impact assessment, catchment management plans and monitoring</p> <ul style="list-style-type: none"> • Before investing in local water quality management strategies, managers need to be sure that water quality is the key issue. Water and sediment quality, while important, is only one aspect of management. <p>In short:</p> <ul style="list-style-type: none"> • The submitter has misunderstood the ANZECC guidelines • The proposed WRC whitua approach which provides for catchment-specific values and objectives is more consistent with the ANZECC guidelines • FFNZ has made recommendations for amendments which are also consistent with ANZECC guidelines, 	

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				including amendments to O5, O25, O26, O35, O44, P1, P3, new policy research and monitoring, P4, P40, P42, new policy land and water management framework, P65, P96, M9, M10, M12 and M27	
		oppose	Discharge to land – new rule to regulate farming	There are already more than enough rules – plus methods - to achieve the outcome sought by the submitter	Reject submission
		oppose	Landuse – new rule to regulate farming	There are already more than enough rules – plus methods - to achieve the outcome sought by the submitter	Reject submission
EDS	S110	Oppose	Add definition of Mitigation, emphasising it is same location only	Intent not clear (perhaps intended in relation to biodiversity offsets?)	Reject submission
Minister of Conservation	S75	Support in part	O25, Table 3.4, include deposited sediment % cover objective for Schedule A and Schedule F1 waterbodies, <20% fine silt or sand	<p>We support the pNRP including sediment cover in rivers significant for indigenous species (subject to changes to Schedule A and F as per our primary submission).</p> <p>We do not support the less than 20% proposal: our understanding is that this number is intended to achieve pre-human conditions.</p>	<p>Record current sediment cover for significant rivers, subject to amendments to schedules as per our primary submission.</p> <p>Identify and prioritise named rivers or reaches for whaitua attention where sediment cover may be above that required to safeguard the health of indigenous species.</p>

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				<p>Instead, as for other parts of our submission above, we recommend the contact recreation template be adopted, ie, record sediment cover as per current, then indicate priorities for whitua attention.</p> <p>In this region, deposited sediment cannot be sensibly considered without looking at willows. Crack willows were widely planted by the Catchment Board; and now present a significant management issue going forward. The complexities are manifold, eg:</p> <ul style="list-style-type: none"> • Livestock exclusion fencing cannot sensibly be required along willow-infested waterways against the ongoing risk of branches damaging/breaching the fence • Clearance of crack willow opens the river to the light and significantly increases algal growth including to levels well in excess of NOF bottomlines, eg on the Kopuaranga River <p>Most importantly in this context:</p> <ul style="list-style-type: none"> • Clearance of crack willow can significantly reduce bank protection, leading to significant ongoing erosion. Again the Kopuaranga is an example • Clearance of bed willows results in a sediment 'slug' 	<p>Make specific provision for recognising the complexities of willow management.</p>

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				<p>moving downstream.</p> <ul style="list-style-type: none"> It is currently our understanding that crack willow clearance may in fact result in increased sediment movement for the short to medium-term (perhaps 30-40 years) 	
		Support in part	O28 wetlands, change "condition" to "values"	<p>This change would be consistent with the NPS.</p> <p>Our support is contingent on the additional amendment we proposed in our primary submission</p>	
		support	P34 fish passage, amendments to provide for creating barriers to protect indigenous species	Consistent with our primary submission.	
		support	R36, amending agchem rule to clarify it refers to discharges directly to water, and to provide for weed control in water supply protection areas	For the reason stated by the submitter	
		support	M21 fish passage, amend to identify priority areas	Consistent with our primary submission.	
Masterton District Council	S367	support	General relief sought: including: full review of s32 reports, full review of all	For the reason stated by the submitter	Undertake full reviews and cost-benefit analyses prior to the hearing.

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			scheduled sites, full review of mapping and reliance on GIS, and full consultation with key stakeholders on the above		
Carterton District Council	S301	support	Definition, maori customary use, requesting clarification	For the reason stated by the submitter	Clarify definition
Porirua City Council	S163	support	<p>Policy and rule framework: including that the policy approach is highly regulatory, the design of plan provisions must take into account the costs of implementation and who is responsible for the financial burden.</p> <p>There is a lack of policy guidance for resource consents, and even those activities that have been classed as permitted have such long lists of stringent and sometimes complex conditions that they have reduced the effect and value of permitted activity status.</p> <p>Additionally: P102 is the</p>	For the reason stated by the submitter	<p>As sought by the submitter, develop or amend policies to enable strategic growth and development, both urban and rural.</p> <p>Amend permitted activity conditions to ensure they:</p> <ul style="list-style-type: none"> • are clear and certain • are capable of consistent interpretation and implementation by lay people without reference to council officers • do not contain subjective terms • do not retain later discretions (decision-making) to council officers

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			only provision in the plan that mentions growth/development strategies and is inadequate on its own.		
Wellington Water Ltd	S135	support	<p>Regulatory Style: the pNRP over emphasises regulation given it contains over 231 rules and only 28 methods. The relatively small number of methods is not a recipe for collaboration in line with the spirit of the whitua process.</p> <p>The plan would better embrace the spirit of collaboration if methods were given more emphasis or developed further, and rules framed in a context of greater shared risk and investment within a collaborative setting.</p> <p>Reduce the number of stringent conditions imposed on permitted activities: generally the fewer the conditions, the more certain they are.</p>	For the reason stated by the submitter	<p>As sought by the submitter: re-balance the plan to reduce regulation and increase methods to enable more collaboration and sharing of risks between GWRC and councils, applicants and the community.</p> <p>Review and prune the PA rules to ensure they are clear and certain and meet Treasury principles for best practice regulation.</p>

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		support	S32 reports: the proposed plan would be strengthened and have greater integrity if the s32 reports more robustly accounted for costs and benefits	For the reason stated by the submitter	Complete more robust s32 reports before the hearing
		support	Consent durations: increased length and certainty of terms lead to much better environmental outcomes for less regulatory effort and cost.	For the reason stated by the submitter, and not just in respect of urban infrastructure	Provide for increased consent durations
		support	P1, include notions of affordability for communities, and willingness to balance environmental quality standards with the cost of paying for improvements to achieve them	For the reason stated by the submitter, and not just in respect of urban infrastructure	Amend P1 to include affordability as a key policy consideration, both urban and rural
		support	P4, amend to refer to efficiency and cost-effectiveness of existing infrastructure and sunk costs, rather than good management practice	For the reason stated by the submitter, and not just in respect of urban infrastructure	Amend P4 to include cost-effectiveness and efficiency of use of existing investment as a key policy consideration, both urban and rural
		support	P5, amend to include purpose of consent review	For the reason stated by the submitter	
		support	P85, provide sufficient policy support and assessment criteria to support rules R77-80	For the reason stated by the submitter, and not just in respect of urban infrastructure	

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		Support in part	P113, recording concern that Wellington Water authorised takes are several times the core allocation listed, and the large difference may lead to a public perception that too much water is being taken for public supply	For the reason stated by the submitter, and not just in respect of public supply	Re-instate the current operative allocations.
		support	P120, taking water for storage, delete the word appropriate	For the reason stated by the submitter	
		support	R61, re-draft the rule to distinguish between effects of continuous high volume wastewater discharges to water, and occasional (wet weather) temporary discharges that have a minor and temporary effect only	For the reason stated by the submitter, in respect also of wet weather ponding or run-off of farm effluent	Amend P68 and R83 to give better effect to the relief sought
		support	R112, providing for more pragmatic conditions for maintenance of existing river structures R114, providing for the damming and diversion of water of water by an existing structure	For the reason stated by the submitter	

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Max Lutz	S348	support	Seeking that the plan define protected customary rights including mahinga kai (3.6)	For the reason stated by the submitter	
		support	Opposing provisions that require third party approvals, eg, cultural impact assessments (3.7)	For the reason stated by the submitter	
		support	That improvements are best done under the whitua process (4.2)	For the reason stated by the submitter	
		support	R83, requesting extended timeframes for high cost mitigations	For the reason stated by the submitter	
Fertiliser Association NZ	S302	Oppose in part	Definition, health needs, seeking deletion	Retain the definition, but clarify its application to water allocation	
		support	Seeking consideration of the conflict between schedule F indigenous species and schedule I trout	For the reason stated by the submitter	Undertake explicit assessment of potential conflicts between Schedule F and Schedule I prior to the hearing
Ravensdown	S310	oppose	Amend R42 to include farming activities, add new rule to regulate farming activities	We have recommended alternative relief in our primary submission.	Relief as sought in FFNZ primary submission

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		Support	Delete R69	For the reasons stated	As sought by the submitter
Irrigation NZ	S306	support	P115, providing for 10 year transition	For the reason stated by the submitter	
		support	New rule, providing for replacement of existing consents to be restricted discretionary	For the reason stated by the submitter	
		support	Schedule P, providing that this schedule is operative only after the model is updated, and individual takes have been categorised with consent holders	For the reason stated by the submitter	
Horticulture NZ	S307	support	3.2.1 new objective for biosecurity	For the reason stated by the submitter	
		Support	3.8 new objective for air	For the reason stated by the submitter	
		support	P7 amend to add 'and provided for'	For the reason stated by the submitter	

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		support	P32, amend and to or	For the reason stated by the submitter	
		support	P41, amend and to or	For the reason stated by the submitter	
Dairy NZ and Fonterra Co-Operative Group Limited	S316	Support in part	New policy to guide Waitua Committees in the development of nutrient management provisions for their respective Waitua for both point source and non-point source discharges.	<p>Support the suggestion that the pNRP could provide guidance for waitua on principles supporting nutrient management.</p> <p>This proposed new policy aligns with relief sought in our primary submission, and should be considered in that broader policy context including:</p> <ul style="list-style-type: none"> • P1 integrated catchment management • New policy research and monitoring • New policy primary production • New policy land and water management framework 	
Beef & Lamb NZ	S311	Support in part	New policy, nutrient allocation framework	Support the suggestion that the pNRP could provide guidance for waitua on principles supporting nutrient management.	

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				<p>As noted above, nutrient allocation based on modelled estimates featured strongly in second generation plans, but the concept is now attracting increased critical scrutiny.</p> <p>Strongly support the principles that nutrient management must be informed by sound science and reliable catchment and farm system measurement and modelling; and that improvement in water quality must remain the primary objective.</p> <p>These principles align with relief sought in our primary submission, and should be considered in that broader policy context including:</p> <ul style="list-style-type: none"> • P1 integrated catchment management • New policy research and monitoring • New policy primary production • New policy land and water management framework 	
A J Barton & Ongaha Farms	S327	support	Whole submission, including that category A/B/C definitions be amended, that robust economic analysis of minimum flows be undertaken, and that economic analysis be revised to take account of	For the reason stated by the submitter	

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			critical periods		
Dan Riddiford	S350	support	Seeking specific recognition of property rights in the plan	For the reason stated by the submitter	
		support	To achieve the purpose of the RMA and regional plan, Council should promote cooperative methods ahead of coercive methods	For the reason stated by the submitter	
Egon Guttke	S14	support	Recommendations for re-balancing the plan to recognise private land, private property rights and economic costs of restrictions, including significant restrictions proposed on private land via Schedule F, Schedule I and Map 20	For the reasons stated by the submitter, consistent with FFNZ primary submission recommending more robust criteria, evidence and cost-benefit analysis of schedules is required	As sought by the submitter, including the removal of headwaters of the Waikanae River from schedule F and I and Map 20 based on evidence provided by the submitter.
GE Free NZ	S139	oppose	O51, seeking inclusion of new organisms	Not council jurisdiction	

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