

GREATER WELLINGTON REGIONAL COUNCIL
PROPOSED NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION

RESPONSE OF THE MINISTER OF CONSERVATION
TO THE OBJECTIVES REVIEW REPORT

1. Thank you for the opportunity to comment on the Enfocus Review of Objectives of the PNRP for the Wellington Region. This document considers the objectives addressed in Hearings 1 and 2.
2. I note that it is difficult to respond to many of the wider themes in the Review, hearing by hearing, as neither of the suggested frameworks correspond to the structure of the hearings. Where Objectives covered by Hearings 1 or 2 are proposed for grouping or amalgamation with Objectives from future hearings, I will address that either here or in the future hearing, depending on where the substantive issues lie.

Objective O1 – Integration.

3. I consider that the Integrated Management Objective can be separated or included with other management objectives dependent on the final structure of the Plan.

Objectives O2 and O8 – Recognising the benefits of land and water, and the water allocation framework.

4. The suggested combination of these objectives is rather uncomfortable, as one recognises the benefits of land and water to the social, economic and cultural well-being of the community, while the other recognises and provides for the social, economic, cultural and environmental benefits of water take and use through the Plan's water allocation aspect, a major function of the Plan.
5. The combined O2 (section 3.1, Enfocus) removes the specific direction to provide for the take and use of water. I consider that this direction should be retained, as

the framework of the Plan does provide for this take and use, within appropriate limits.

6. The addition of “...(where appropriate) allocation of these resources” to an objective that addresses more than allocable water resources is unclear and may lead to confusion if other land or water resources are considered allocable.
7. Given the separate basis and purpose of these objectives, I do not consider their combination would improve the Plan and may lead to unforeseen consequences with the management of non-water resources.

Objectives O5 and O25 – Water quality

8. Water quality objectives are required to give effect to the NPSFM. I consider that there may be more efficient ways to structure the relevant objectives, including by using consistent terminology.
9. However, there are several threads that permeate the Freshwater Objectives (Figure 1, Enfocus) and I consider the objectives must clearly support the policies and rules that manage these.
10. As the substantive issue on water quality will be addressed in Hearing 4, comments on the structure of these objectives will be presented then.

Objectives O12 and O13 – Significant infrastructure and renewable energy generation

11. While recognition of the benefits of regionally significant infrastructure and renewable energy generation activities, and protecting their use and ongoing operation from reverse sensitivities can be combined, the replacement of “use and ongoing operation” with “use and development” changes the intent of the objectives considerably, as development has wider implications than the wording in either notified objective.

Land Use Objectives for Water Quality and Aquatic Ecosystem Health, Soil and Land Use.

12. Many of the objectives of the Natural Resources Plan seek to achieve specific land based management outcomes in order to maintain and enhance aquatic values. These objectives, and their suite of associated policies and rules are integrated and well connected.

13. There are a number of ways in which these can be organised, although, and signalling that they relate to the management of land that does not specifically stem from a discharge to or take of water is useful for a user point of view.

Objective O27 – Riparian margins

14. As demonstrated by the hearing evidence, the establishment and maintenance of vegetated riparian margins is considered an important step towards improving water quality and minimising sedimentation of waterbodies and coastal areas.

15. Given the issues with sedimentation of sensitive and ecologically significant coastal estuaries, including the regionally significant Porirua Harbour, I consider this is significant issue for the Natural Resources Plan and note that the establishment of riparian plant cover along the majority of stream lengths in the Porirua Harbour Catchment is a key ecological health target in the Te Awarua-O-Porirua Harbour and Catchment Strategy and Action Plan (June 2015).

16. I consider that Objective O27 should be retained, with amendments as proposed in Hearing 2, and grouped with other land use objectives for the reasons given in paragraph 19 below.

Objectives O44 and O45 – Land use and livestock access

17. Once again, the hearing evidence, including the s42A report, have recommended improvements to this Objective, and combination with Objective 45, recognising the adverse effects of stock access and other activities to the values of waterbodies.

18. Given the somewhat complex rules that require exclusion of livestock from certain waterbodies by different dates, a single objective stating the overall expected outcome of land use activities, including the exclusion of livestock from surface water bodies or the coastal marine area provides clear direction that may be lost otherwise.
19. As this Objective, like several of the land use objectives including Objective O27, is proposed to address both water quality and aquatic ecosystems, it cannot be assigned specifically to either of these topics. I consider that a specific objective section to support policies in sections 4.8.9 to 4.8.11 would be helpful.
20. I also consider that the effectiveness of this objective would be improved by specific reference to the water quality standards in Objectives O24 and O25.

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