

Further Submission on Proposed Wellington Natural Resources Regional Plan

(Closing date: Tuesday 29 March 2016)

To: Greater Wellington Regional Council
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Horticulture New Zealand

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Horticulture New Zealand represents horticultural growers in the Wellington Region, so represents a relevant aspect of the public interest.

Horticulture New Zealand is not a trade competitor and would not gain any advantage through this further submission.

I do wish to be heard in support of my submission

If others make a similar submission, I **would not** be prepared to consider preparing a joint case with them at any hearing.



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Signature of person making submission or person authorised to sign on behalf of person making submission.

Date: 29 March 2016

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Federated Farmers	S352/035	Definition Mana Whenua	Support	The change sought seeks to limit the definition to identified sites in the Plan. This is supported as it provides certainty for landowners.	Accept submission of Federated Farmers
Dairy NZ and Fonterra Co-operative Group Ltd	S316/016	Definition of Mean Annual Low Flow (MALF)	Support	The submission seeks to amend the definition to more accurately determine the mean annual low flow as the 7 day or 5 day variant in use by hydrologists. This is supported as it is science based.	Accept submission by Dairy NZ and Fonterra.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/017	Definition of Point source discharge	Support	The changes sought are necessary so that the definition is linked to clearly identified point sources.	Accept submission by Dairy NZ and Fonterra.
Fertiliser Assoc of NZ	S302/008	Definition of property	Oppose	The submitter seeks to amend the definition of Property to include land held in one or more than one ownership that is utilised as a single operating unit, and may include one or more certificates of title. This is much broader than the definition proposed and would impact on how the Plan is implemented.	Retain definition of property as proposed.
Wairarapa Water User's Incorporated Society	S124/002	Definition Regionally significant infrastructure	Support	The submitter seeks that water race networks and facilities for the irrigation of pasture and crops are included in the definition. This is supported as these are important regional infrastructure.	Accept submission by Wairarapa Water User's Incorporated Society to amend the definition of regionally significant infrastructure.
PowerCo	S29/060	Definition Regionally significant infrastructure	Oppose	The submitter seeks to amend the definition to include all supply within the local electricity distribution network as 'regionally significant'. While supply of electricity is important not all the local distribution is 'regionally significant' in that it is critical to the region.	Reject the submission by Powerco to amend the definition of regionally significant infrastructure.

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Dairy NZ and Fonterra Co-operative Group Ltd	S316/006	2.1.5 Whaitua chapters	Support	The additional text sought provides clarity about the relationship of the Whaitua chapters in the Plan.	Accept submission by Dairy NZ and Fonterra to add additional text re the Whaitua chapters.
NZTA	S146/031	Def of reverse sensitivity	Oppose in part	The submitter seeks that the definition of reverse sensitivity includes provision for activities to be upgraded or developed, not just operated. Horticulture NZ supports the proposed definition and considers that the extent of development of an activity that is protected from reverse sensitivity complaint needs to consider the change in scale and nature of the activity	Retain definition of reverse sensitivity as proposed in the Plan.
Porirua Harbour and Catchment Community Trust	S33/044	New definition aerial spraying	Oppose	The submitter seeks a definition for aerial spraying for the purposes of rules R36 and R37. It is unclear why a definition is required and specific wording has not been sought.	Reject the submission to include a definition of aerial spraying.
Fish and Game	S308/006	New definition for natural productive capability of land and soils	Oppose in part	The submitter seeks a definition for natural productive capability of land and soils based on the natural capital allocation system including soil type, slope and rainfall. The approach is not supported by Horticulture NZ as it reduces the flexibility for land use on land that does not have high natural capital which is essentially constrained by land with high leaching potential being allocated a significant proportion of the share of the nutrients available.	Reject the submission to include a definition for natural productive capability of land and soils based on the natural capital allocation system and incorporation into the allocation framework.
Fish and Game	S308/007	New definition for natural character	Oppose	Natural character has been defined through case law and it is best to rely on that.	Reject the submission to include a definition for natural character
Porirua City Council	S163/020	New definitions	Oppose	The submitter seeks to add a range of definitions linked to future growth and development, including scheduled areas being mapped and RDA status for activities within such areas. Such an approach is inappropriate in a definition and identified areas should be open for submission.	Reject the submission of Porirua City Council to add definitions for future growth and development.

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Dairy NZ and Fonterra Co-operative Group Ltd	S316/020	Definition stepdown allocation	Support	The submitter seeks to amend the definition to link low flows to protect minimum flows. This is a simpler definition to apply.	Accept submission by Dairy NZ and Fonterra to amend definition of step down allocation.
Wellington Water Ltd	S135/027	Definition stormwater	Oppose	The submitter seeks to broaden the definition of stormwater to include water that has infiltrated and percolated through soil to a drain and includes groundwater (or to like effect). This considerably extends the scope of the stormwater provisions in the plan and is inappropriate in rural locations.	Reject the submission by Wellington Water Ltd to broaden the definition of stormwater.
Masterton District Council	S367/033	Definition stormwater network	Oppose	The submitter seeks to include water races as part of the stormwater network. The definition should be limited to those devices managed by the local authority as part of the stormwater network.	Reject the submission by Masterton District Council to amend the definition of stormwater network.
Federated Farmers	S352/051	Definition surface water body	Support	The change sought seeks to better align the definition with the RMA. This is supported	Accept submission of Federated Farmers to amend the definition of surface water body.
Meridian Energy Ltd	S82/007	Definition upgrade	Support	The submitter seeks to amend the definition of upgrade but retains the important component that the scale and intensity are the same as the existing activity. It is important that this is retained to ensure that upgrades don't adversely affect other parties.	Amend definition of upgrade as sought by Meridian Energy Ltd.
Federated Farmers	S352/052	Definition vegetation clearance	Support	The change sought seeks to better incorporate that not all vegetation clearance needs to be captured by the definition and rules.	Accept submission of Federated Farmers to amend the definition of vegetation clearance.
Federated Farmers	S352/019	Definition category 2 surface water body	Support	The change sought seeks provide greater clarification and link to the relevant rule	Accept submission of Federated Farmers to amend the definition of category 2 surface water body.
The Oil Companies	S55/070	Definition contaminated land	Support	The change sought seeks provide greater clarification.	Accept submission of the Oil Companies to amend the definition of contaminated land

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Beef and Lamb NZ	S311/003	Definition drain	Support in part	The submitter appears to be seeking clarity as to how various definitions interrelate. Clarification is supported.	Clarify the purpose of definition of drain, artificial farm drainage canal and highly modified water course
Federated Farmers	S352/024	Definition earthworks	Support in part	Farm drains, dams and tracks should be able to maintained without being included in the earthwork provisions	Accept submission of Federated Farmers to amend the definition of earthworks by adding farm drains and farm dams and maintenance of farm tracks.
Beef and Lamb NZ	S311/007	Definition erosion prone land	Oppose	The submitter seeks to include all Land that has an erosion (e) classification under the Land Use Capability soil classification system as Erosion prone land regardless of slope. The intent of the rules and definition as proposed is effects based as it is linked to slope.	Reject submission to amend the definition of erosion prone land.
Federated Farmers	S352/027	Definition fertiliser	Oppose	The submitter seeks that lime is excluded for the purpose of Rule R82. If it was excluded then a consent would be required for the application of lime. This is not effects based.	Reject the submission to delete lime from the definition of fertiliser for the purpose of R82.
Derek Neal	S278/002	Definition fertiliser	Oppose	The submitter seeks that lime is excluded from the definition of fertiliser. If it was excluded then a consent would be required for the application of lime. This is not effects based.	Reject the submission to delete lime from the definition of fertiliser.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/014	Definition of good management practice	Support	The changes sought provide clarification and is similar in intent to changes sought by Horticulture NZ.	Accept submission by Dairy NZ and Fonterra to amend the definition of good management practices.
Fertiliser Assoc of NZ	S302/007	Definition of high risk soils	Oppose	The submitter seeks to amend the definition of by including risk of nutrient leaching. This is not appropriate given how the definition is used in the Plan.	Reject the submission to amend the definition of high risk soil as sought by Fertiliser Assoc.
Beef and Lamb NZ	S311/005	Definition highly modified river or stream	Support in part	The submitter appears to be seeking clarity as to how various definitions interrelate by including the definition within 'drain'. Clarification is supported.	Clarify the purpose of definition of drain, artificial farm drainage canal and highly modified water course

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Fish and Game	S308/039	New objectives	Oppose	The submitter seeks new objectives and provisions that set numerical targets/ limits to achieve a list of matters for water quality identified by the submitter. The objectives for water quality and water quantity should take into account a range of values, including food production and social and economic wellbeing.	Reject submissions to introduce new objectives by Fish and Game.
Fish and Game	S308/013	Objective O2	Oppose	The submitter seeks that recognition of ecosystem health, ecological processes, natural character, and ecosystem services to the economic, social, and cultural aspects be included within Objective O2. The objective is focussed on contribution of land and water to social, economic and cultural wellbeing so specific matters do not need to be listed.	Reject submissions to amend O2 by Fish and Game.
Fish and Game	S308/015	Objective O5	Oppose	The objective sets out how fresh water bodies will be managed. The submitter seeks to substantially add to the matters listed. The objective should set the overall approach with details in the policy.	Reject submissions to amend O5 by Fish and Game.
Fertiliser Assoc of NZ	S302/011	Objective O5	Support in part	The submitter seeks that recognition is included for primary production in the objective. It would be more consistent with the NPSFM that food production is recognised, as sought by Horticulture NZ.	Accept in part the submission and include recognition of food production in Objective O5
Fertiliser Assoc of NZ	S302/014	3.2 Beneficial use and development new objectives	Support	The submitter seeks new objectives that provide for the use of land for cultural, social and economic activities that benefit the community and the Region is enabled and provided for within the Plan and an Objective that provides for the efficient and productive use of land for primary production that contributes to the economic wellbeing of the Region and New Zealand. The addition of such objectives would provide better balance in the plan.	Accept the submission to include new objectives as sought by Fertiliser Assoc.

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Ravensdown Ltd	S310/012	3.2 Beneficial use and development new objectives	Support	The submitter seeks that a new objective is added to address reverse sensitivity issues. Reverse sensitivity is an important issue that needs to be addressed in the Plan/	Accept the submission to include a new objective as sought by Ravensdown.
Federated Farmers	S352/066	3.2 Beneficial use and development new objectives	Support	The submitter seeks that a new objective is added to address reverse sensitivity issues. Reverse sensitivity is an important issue that needs to be addressed in the Plan/	Accept the submission to include a new objective as sought by Federated Farmers.
Irrigation NZ	S306/001	Objective O8	Support	The addition of water storage is appropriate to ensure that it is adequately provided for in the Plan.	Accept the submission by INZ to include water storage in O8.
Fish and Game	S308/017	Objective O8	Oppose	The objective is in the 'beneficial use and development' section. The matters sought by the submitter are included within other objectives.	Reject submissions to amend O8 by Fish and Game.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/029	Objective O17	Support	The submitter seeks a separation between coastal marine waters and freshwater to ensure consistency with provisions in the RMA and NPSFM. This is appropriate and supported.	Accept submission by Dairy NZ and Fonterra to amend Objective O17.
Fish and Game	S308/018	Objective O17	Oppose	The objective sets out how natural character will be managed. The submitter seeks to substantially add to the matters listed. The objective should set the overall approach with details in the policy.	Reject submissions to amend O17 by Fish and Game.
Fish and Game	S308/019	Objective O19	Oppose	The objective sets out how natural processes will be managed. The submitter seeks to substantially add to the matters listed. The objective should set the overall approach with details in the policy.	Reject submissions to amend O19 by Fish and Game.
Fish and Game	S308/148	Table 3.2	Oppose	It is important that secondary contact is retained for water bodies where appropriate.	Reject submissions to delete Table 3.2 by Fish and Game.
Fish and Game	S308/012	New objectives, policies and rules	Oppose	The submitter seeks wide ranging changes focused on sports fishing and angling values. These values need to be balanced against all other appropriate values.	Reject submissions to add new objectives, policies and rules by Fish and Game.

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Fish and Game	S308/023	Objective 24	Oppose	The submitter seeks to require primary contact recreation values in all water bodies. It is important that secondary contact is retained for water bodies where appropriate.	Reject submissions to amend O24 by Fish and Game.
Minister of Conservation	S75/027	Objective O25: Aquatic ecosystem health and mahinga kai	Oppose in part	The submitter that all tables are amended to use numeric objectives in preference to narrative objectives, where possible, and replace words such as 'balanced' and 'unacceptable' with clear, meaningful terms that support the objective. It is not possible to have numeric objectives for all matters so narrative objectives are required. This is consistent with the NPSFM.	Retain narrative objectives in the tables following Objective 25.
Fish and Game	S308/027	Objective 25	Support in part Oppose in part	Separation of aquatic ecosystem health from mahinga kai is supported as they may necessitate different provisions. The relationship of the Whaitua chapters needs to be included but they should not be subservient but provide for catchment specific responses.	Separate aquatic ecosystem health from mahinga kai. Retain reference to the Whaitua chapters as notified.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/033	Objective O25	Support	Separation of aquatic ecosystem health from mahinga kai is supported as they may necessitate different provisions. The relationship of the Whaitua chapters needs to be included but provide for catchment specific responses.	Accept submission by Dairy NZ and Fonterra Co-operative Group Ltd to amend Objective 25.
Masterton District Council	S367/049	Objective 27	Support	The submitter seeks that vegetated riparian margins are established and maintained, <u>where appropriate and necessary</u> . Horticulture NZ supports this approach as vegetated margins is only one tool to achieve the outcome sought and may not be the most appropriate in some situations.	Accept submission by Masterton District Council to amend Objective 27.

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Fish and Game	S308/030	Objective 30	Oppose	The submitter seeks changes to provide greater protection on sports fishing and angling values. These values need to be balanced against all other appropriate values.	Reject submissions to add new objectives, policies and rules by Fish and Game.
Masterton District Council	S367/051	Objective 31	Support	The submitter seeks that the objective is linked to protection from inappropriate use and development which is consistent with the RMA. Clearly specifying the relevant schedules provides certainty for users.	Accept submission by Masterton District Council to amend Objective 31.
Masterton District Council	S367/052	Objective 32 - 38	Support	The submitter seeks that the objectives are clearly linked to the relevant schedules which provides certainty for users.	Accept submission by Masterton District Council to amend Objectives 32-38 as sought.
Masterton District Council	S367/058	Objective 32 - 38	Support	The submitter seeks that the objectives are clearly linked to the relevant schedules which provides certainty for users.	Accept submission by Masterton District Council to amend Objectives 32-38 as sought.
The Oil Companies	S55/005	Objective 41	Support in part	The change sought is similar in approach to the changes sought by Horticulture NZ.	Amend Objective 41 as sought by Horticulture NZ.
Federated Farmers	S352/097	3.8 Air new objective	Support in part	The submitter seeks a new objective regarding location of sensitive activities. Horticulture NZ sought a new objective (does not appear to be included in summary) that recognises different background receiving environments to achieve a similar outcome in managing potential for reverse sensitivity	Include new objective as sought by Horticulture NZ.
Fish and Game	S308/033	3.9 Soil new objectives	Oppose	The submitter seeks that Hill country land uses, intensive farming, horticulture, cropping and plantation forestry are regulated to good management practice and output based standards which avoid discharges of sediment to freshwater habitats and ensure that these land use activities include provisions which establish appropriate riparian setback distances. The objective sets out the outcome sought. The matters sought by the submitter are specific methods to achieve the	Reject the submission by Fish and Game to add provisions to regulate specific sectors.

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				outcomes. The rule framework provides for appropriate measures to manage the potential for adverse effects	
Fish and Game	S308/034	Objective 42	Support in part Oppose in part	<p>The submitter seeks that Objective 042 is amended to ensure that: Land use is sustainably managed to protect the life supporting capacity of soils and where degraded to improve soil health and structure. That land use is sustainably managed so as to prevent loss of soils to freshwater habitats to achieve the freshwater objectives set in table 3.4 and 3.4a by 2030.</p> <p>Horticulture NZ supports that life supported capacity of soils is safeguarded but seeks a new objective to better provide for accelerated soil erosion.</p> <p>Objective 44 addresses a number of matters raised by the submitter.</p>	Accept the submission of Horticulture NZ to amend Objective 42 and add a new objective for accelerated soil erosion.
NZ Transport Agency	S146/062	Objective 43	Support in part	<p>The submitter seeks that Objective O43 is amended to ensure that Contaminated land is <u>identified and managed to protect human health and the environment from unacceptable contamination related effects.</u></p> <p>The NES for soil contamination focusses on human health so this should be retained. The Regional Council has the function of identifying contaminated land. It also needs to be clear what the land is being managed for.</p>	Accept in part the submission to amend Objective O43.
Fish and Game	S308/034	Objective 44	Oppose	The submitter seeks to Amend objectives O44, O46, and O47, or create new objectives, and create associated	Reject the submission to amend O44, O46, and O47, or create

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				<p>policies and rules to manage the impacts of water takes, land use and ancillary discharge activities on freshwater.</p> <p>These matters are appropriately managed in the Plan.</p>	<p>new objectives, and create associated policies and rules to manage the impacts of water takes, land use and ancillary discharge activities on freshwater.</p>
The Oil Companies	S55/008	Objective 46	Support in part	<p>Horticulture NZ has sought changes to O46 but the focus on adverse effects as sought by the submitter is appropriate.</p>	<p>Amend O46 as sought by Horticulture NZ and the Oil Companies.</p>
Fish and Game	S308/035	Objective 46	Oppose	<p>The submitter seeks to Amend objectives O44, O46, and O47, or create new objectives, and create associated policies and rules to manage the impacts of water takes, land use and ancillary discharge activities on freshwater.</p> <p>These matters are appropriately managed in the Plan.</p>	<p>Reject the submission to amend O44, O46, and O47, or create new objectives, and create associated policies and rules to manage the impacts of water takes, land use and ancillary discharge activities on freshwater.</p>
Ravensdown	S310/019	Objective 47	Support in part	<p>The focus on good management practice is supported.</p>	<p>Include use of good management practice in Objective 47.</p>
Fish and Game	S308/036	Objective 47	Oppose	<p>The submitter seeks to Amend objectives O44, O46, and O47, or create new objectives, and create associated policies and rules to manage the impacts of water takes, land use and ancillary discharge activities on freshwater.</p> <p>These matters are appropriately managed in the Plan.</p>	<p>Reject the submission to amend O44, O46, and O47, or create new objectives, and create associated policies and rules to manage the impacts of water takes, land use and ancillary discharge activities on freshwater.</p>
Ravensdown	S310/020	Objective 51	Support	<p>The focus on avoiding, remedying or mitigating adverse effects is supported.</p>	

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Wairarapa Water User's Incorporated Society	S124/006	Objective 52	Support	The changes sought improve the objective	
Fish and Game	S308/038	Objective 52	Oppose	<p>The submitter seeks that objective O52 is amended to ensure that water take and use is 1) necessary, 2) reasonable, and where it is both necessary and reasonable it is 3) efficient. Include numerical criteria for technical efficiency and for what is considered reasonable.</p> <p>The provisions in the Plan provide for these matters so amendments are not required.</p>	Reject submission by Fish and Game to amend Objective 52.
Beef and Lamb NZ	S311/002	New policy	Support	The submitter seeks a new nutrient allocation policy based on a set of principles included in the submission. Horticulture NZ accepts some of the principles as being appropriate but has concerns about the natural capital of soils being the primary consideration when establishing an allocation. Natural capital or an LUC type approach does not take into account the capacity of soils for different crops so a blanket natural capital approach may not be appropriate depending on what is being grown (eg grapes vs vegetables). The use of good management practice is supported.	Ensure that Principles 1-4 and 6-14 are incorporated into the nutrient allocation approach in the Plan.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/042	Policy P3	Support	The splitting of the policy into one for the coastal environment and another for other areas provides for the different management regimes for the respective areas.	Accept the submission by Dairy NZ and Fonterra Co-operative Group Ltd to amend P#.
Fish and Game	S308/043	Policy P4	Oppose	The submitter seeks that the policy is deleted and replaced with a policy that seeks to avoid a range of adverse effects. Such an approach would effectively prohibit a range of activities in the region that can be appropriately managed.	Reject submission by Fish and Game to amend Policy P4.

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The Oil Companies	S55/013	Policy P5	Support	The submitter seeks that the policy is amended to add "where evidence can be produced of adverse effects attributable to the exercise of the consent." This is supported as it identifies when a review is appropriate.	Accept the submission by the Oil Companies to amend Policy P5.
Fish and Game	S308/045	Policy P6	Oppose	The Whaitua process will determine if common expiry dates are appropriate.	Reject the submission to include common expiry dates.
Federated Farmers	S352/114	Policy P6.	Support	A common review date is appropriate, rather than common expiry dates.	Accept the submission to include common review dates.
Federated Farmers	S352/126	4.2 Beneficial use and development New policy	Support	Provision for irrigation and water storage are important for the region and need to be provided for in the Plan	Add a new policy as sought to provide for irrigation and water storage.
Federated Farmers	S352/129	4.2 Beneficial use and development New policy	Support	A policy to provide recognition of reverse sensitivity is supported as it is an important issue for primary producers.	Add a new policy as sought to recognise reverse sensitivity.
Federated Farmers	S352/125	4.2 Beneficial use and development New policy	Support	Provision for primary production is important for the region and need to be provided for in the Plan	Add a new policy as sought to provide for primary production.
Fish and Game	S308/049	Policy P10	Oppose	It is important that secondary contact is retained for water bodies where appropriate.	Reject submission to amend Policy P10.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/047	Policy P11	Support	Provisions for water storage are important for the region and the changes sought to the policy assist.	Accept the submission by Dairy NZ and Fonterra to amend Policy P11.
Wellington Electricity Lines Ltd	S126/015	Policy P12	Oppose in part	Horticulture NZ does not support that local distribution lines be classed as regionally significant infrastructure – rather focussing on lines which are critical to the whole region.	Ensure that local distribution lines are not classed as regionally significant infrastructure.

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Wellington Electricity Lines Ltd	S126/016	Policy P13	Oppose in part	Horticulture NZ does not support that local distribution lines be classed as regionally significant infrastructure – rather focussing on lines which are critical to the whole region.	Ensure that local distribution lines are not classed as regionally significant infrastructure.
Wellington Electricity Lines Ltd	S126/017	Policy P14	Oppose in part	Horticulture NZ does not support that local distribution lines be classed as regionally significant infrastructure – rather focussing on lines which are critical to the whole region.	Ensure that local distribution lines are not classed as regionally significant infrastructure.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/050	Policy P14	Support in part	The submitter seeks that primary production is included in Policy P14. Horticulture NZ has sought that a new policy be included for primary production activities. It is important that the existence of incompatible activities to primary production is recognised in the Plan.	Ensure that the existence of incompatible activities to primary production is recognised in the Plan.
NZTA	S146/090	Policy P25	Support	The changes sought provide better balance in the policy and avoid the use of 'avoid' as a consequence of the King Salmon decision	Amend Policy P25 as sought by NZTA.
Forest and Bird	S353/066	Policy P25	Oppose	The change from coastal marine area to coastal environment raises issues as coastal environment is not defined so is not clear what land the policy would apply to.	Reject the submission by Forest and Bird to amend Policy P25.
NZTA	S146/094	Policy P31	Support	The changes sought provide better balance in the policy by use of avoid, remedy or mitigate.	Amend Policy P31 as sought by NZTA.
Federated Farmers	S352/145	Policy P37	Support	Recognition of the sediment trapping functions of wetland is supported	Amend Policy P37 as sought by Federated Farmers.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/063	Policy P48	Support	The changes sought provide better balance in the policy by providing a separation of different issues	Amend Policy P48 as sought by Dairy NZ and Fonterra.
NZTA	S146/110	Policy P52	Support	The changes sought provide better balance in the policy by use of avoid, remedy or mitigate.	Amend Policy P52 as sought by NZTA.
Fish and Game	S308/060	Policy P63	Oppose	It is important that secondary contact is retained for water bodies where appropriate.	Reject submission to amend Policy P63.
Ravensdown Ltd	S310/033	Policy P65	Support	The submitter seeks that the policy be amended to focus on managing adverse effects	Amend Policy P65 as sought by Ravensdown Ltd.

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Fish and Game	S308/062	Policy P65	Oppose	The submitter seeks wide ranging changes including new policies, as it is not considered that the policy framework will achieve the outcomes the submitter seeks.	Reject the submission of Fish and Game to add new policies.
Ravensdown Ltd	S310/034	Policy P67	Support	The submitter seeks that the policy be amended to focus on managing the activity	Amend Policy P67 as sought by Ravensdown Ltd.
Carterton District Council	S301/042	Policy P69	Oppose	Deleting 'to the extent practicable' as sought by the submitter means that all adverse effects would have to be avoided, regardless of the circumstances or situation.	Reject submission to amend Policy P69 by Carterton District Council.
Fertiliser Assoc	S302/052	Policy P90	Support in part	Horticulture NZ seeks that Policy P90 is retained but changes sought by the submitter improve the policy by reference to HSNO	Accept submission to change Policy P90 by Fertiliser Assoc.
Fish and Game	S308/061	Policy P96	Oppose	The submitter seeks wide ranging changes including new policies, as it is not considered that the policy framework will achieve the outcomes the submitter seeks.	Reject the submission of Fish and Game to add new policies.
Forest and Bird	S353/102	Policy P96	Oppose	The policy should stand alone rather than reference back to Policy P65.	Reject the submission by Forest and Bird to amend Policy P96.
NZTA	S146/122	Policy P97	Support	The changes sought are effects based and supported.	Accept changes to Policy P97 sought by NZTA.
Porirua City Council	S163/074	Policy P97	Oppose	Good management practice is defined in the Plan so provides guidance as to what good management practices are being referred to.	Reject the submission by Porirua City Council to amend Policy P97.
Federated Farmers	S352/175	Policy P100	Support	The changes sought by the submitter clarify the intent of the policy. Riparian setbacks are a good management practice that may be appropriate in some situations but shouldn't be given priority over other mechanisms.	Accept the submission by Federated Farmers to amend Policy P100.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/069	Policy P101	Oppose	Riparian setbacks are a good management practice that may be appropriate in some situations but shouldn't be given priority over other mechanisms so inclusion of cultivation in Policy P101 and deleting Policy P100 is not supported.	Reject the submission of Dairy NZ and Fonterra to amend Policy P101.

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Wairarapa Regional Irrigation Trust	S127/029	4.9 Taking, using, damming and diverting water New policy	Support	There should be provisions in the Plan to enable takes from storage reservoirs.	Accept submission by Wairarapa Regional Irrigation Trust to include provisions for takes from storage reservoirs.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/081	Policy P107	Support	There should be provisions in the Plan to enable takes from storage reservoirs.	Accept submission by Dairy NZ and Fonterra to amend Policy 107
Fish and Game	S308/071	Policy P107	Oppose	The submitter seeks that water quantity standards/ limits/ targets are clearly stated and should include minimum flows, core allocations, and requirements to maintain hydrological processes and variability, and protect flows which provide for fish migration and spawning, and which manage periphyton and cyanobacteria growths. Policy P107 is an overall direction policy with specific matters addressed in other policies to reflect the range of values that exist for water allocation.	Reject the submission to amend Policy P107.
Federated Farmers	S352/177	Policy P107	Support in part	The change sought by the submitter provides for interim provisions until the Whaitua have completed consideration of catchment specific allocation.	Amend Policy P107 as sought by Federated Farmers.
Wellington Water Ltd	S135/108	Policy P111	Support	Rootstock protection should be added to be consistent with Policy 112	Accept submission to add rootstock protection to Policy P111.
Fish and Game	S308/073	Policy P111	Oppose	The submitter seeks deletion of water for rootstock protection. This water is important for the regional economy and should be retained.	Reject submission to amend Policy P111.
Minister of Conservation	S75/100	Policy P112	Support in part	The submitter suggests an alternative mechanism for incorporating water for rootstock protection through the setting of minimum flows. The important aspect is that this water is considered as part of the allocation framework.	Consider the approach to allocation of water for rootstock protection.

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Fish and Game	S308/074	Policy P112	Oppose	The submitter seeks deletion of water for rootstock protection. This water is important for the regional economy and should be retained.	Reject submission to amend Policy P112.
Rangitane o Wairarapa Inc	S279/143	Policy P112	Oppose	The submitter seeks deletion of water for rootstock protection. This water is important for the regional economy and should be retained.	Reject submission to amend Policy P112.
Federated Farmers	S352/180	Policy P113	Support	The change sought by the submitter provides for interim provisions until the Whaitua have completed consideration of catchment specific allocation.	Amend Policy P113 as sought by Federated Farmers.
Wellington Water Ltd	S135/111	Policy P113	Support	Rootstock protection should be added to be consistent with Policy 112	Accept submission to add rootstock protection to Policy P113.
Fish and Game	S308/076	Policy P113	Oppose	The submitter seeks that policies are amended to meet criteria. The Plan provides an overall framework to meet objectives for the region.	Reject the submission by Fish and Game to amend Policy P113
Fish and Game	S308/077	Policy P115	Oppose	The submitter seeks changes including deletion of water for rootstock protection. This water is important for the regional economy and should be retained.	Reject the submission by Fish and Game to amend Policy P115
Irrigation NZ	S306/010	Policy P115 c)	Support in part	The submitter seeks additional criteria for provision of water for rootstock protection: The amount of water needed should be determined through considering crop type, soil type and weather forecast. These matters are in part included in c ii)	Consider the approach to allocation of water for rootstock protection.
Fish and Game	S308/082	Policy P117	Oppose	The current policy has a framework for supplementary allocations to meet Objective O25. The additional matters listed are not necessary.	Reject the submission by Fish and Game to amend Policy P117.
Fish and Game	S308/079	Policy P118	Oppose	The submitter seeks changes to ensure that water takes are efficient. The Plan has provisions to assess efficiency.	Reject the submission by Fish and Game to amend Policy P118
Dairy NZ and Fonterra Co-operative Group Ltd	S316/091	Policy P129	Support	Reference to Policy P117 is appropriate	Amend Policy P129 as sought by Dairy NZ and Fonterra.

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Fish and Game	S308/128	5. Rules	Oppose	The submitter seeks changes to the rules including that provisions are deleted which allow takes below minimum flow for root stock and encourage water saving and storage options. These are important for the regional economy and should be retained.	Reject the submission by Fish and Game to amend rules.
Fish and Game	S308/84	5. Rules	Oppose	The submitter seeks changes to the rules to implement an alternative approach to managing water as set out in objectives sought by the submitter. Horticulture NZ does not consider that the alternative approach is the most appropriate or efficient for the Wellington region.	Reject the submission by Fish and Game to amend rules.
Fish and Game	S308/97	5. Rules	Oppose	The submitter seeks changes to the rules to implement an alternative approach to managing water as set out in objectives sought by the submitter. Horticulture NZ does not consider that the alternative approach is the most appropriate or efficient for the Wellington region.	Reject the submission by Fish and Game to amend rules.
Fish and Game	S308/98	5. Rules	Oppose	The submitter seeks changes to the rules to implement an alternative approach to managing water as set out in objectives sought by the submitter. Horticulture NZ does not consider that the alternative approach is the most appropriate or efficient for the Wellington region.	Reject the submission by Fish and Game to amend rules.
Federated Farmers	S352/184	5.Rules	Support	Restricted Discretionary rules should be used where possible with clear matters of discretion	Accept submission by Federated Farmers to include Restricted discretionary rules.
Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council	S85/079	5.1 Air Quality rules	Oppose	The submitter seeks that agrichemical spraying in public places should not require an annual spray plan, neighbour notification, or a risk assessment. These are best practice and are important where spraying is undertaken in public places.	Reject the submission
Porirua City Council	S163/081	Rule R36	Oppose	The submitter seeks that the rules for agrichemical spraying should not apply along roads and urban areas should not	Reject the submission

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
				These are best practice and are important where spraying is undertaken in public places.	
Simon Stannard	S115/001	Rule R 36	Oppose	Commercial applicators should be appropriately trained in agrichemical use, regardless of quantity applied	Reject the submission
Wairarapa Winegrowers Association	S103/004	Rule R36	Support in part	There should be clear provisions for hand held knapsack spraying and use in residential areas.	Add a rule for hand held knapsack spraying and use in residential areas.
Wairarapa Winegrowers Association	S103/005	Rule R36	Oppose	Conditions g- o are best practice and all users of agrichemicals should be using such practices.	Reject the submission
Minister of Conservation	S75/116	Rule R36	Oppose in part	Condition b) does not preclude use for controlling environmental weeds.	Reject the submission
Minister of Conservation	S75/122	Rule R36	Oppose	Condition k, l and m are best practice and should be used by all agrichemical users.	Reject the submission
Minister of Conservation	S75/117	Rule R36	Support	The submitter seeks that (e) be amended so that it refers to discharge directly into water, and allows discharge to land where it may enter water. This provides greater clarity.	Accept the submission to amend clause e) of R36.
Minister of Conservation	S75/123	Rule R36	Oppose	Condition n i) is best practice and should be used by all agrichemical users.	Reject the submission
Minister of Conservation	S75/119	Rule R36	Oppose	NZS8409 is an approved code of Practice under HSNO and is an appropriate mechanism to achieve HSNO regulations.	Reject the submission
Minister of Conservation	S75/120	Rule R36	Oppose	Condition h and i)are best practice and should be used by all agrichemical users.	Reject the submission
Federated Farmers	S352/185	Rule R 36	Oppose	The submitter seeks to delete condition g requiring a spray plan. A spray plan is best practice and should be used by all agrichemical users. An Approved Handler Certificate is not adequate or appropriate to assess and manage potential for spray drift.	Reject the submission

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Porirua Harbour and Catchment Community Trust	S33/031	Rule R36	Oppose in part	The submitter seeks that those undertaking spraying on small rural properties not require GROWSAFE training. If the activity is undertaken using a hand held knapsack sprayer training is not required. Other forms of application should require appropriate training.	Reject the submission
Land Matters	S285/078	Rule R36	Oppose	The submitter seeks to delete conditions which are best practice for agrichemical spraying, including appropriate training.	Reject the submission
Waa Rata Estate	S152/047	Rule R37	Oppose in part	Those who take water below where the discharge to water is to occur should be notified so they can take action to avoid adverse effects	Reject the submission
Minister of Conservation	S75/126	Rule R37	Oppose	The submitter seeks that training requirements for aquatic applications be deleted. It is best practice that users applying agrichemicals to water are appropriately trained.	Reject the submission
Ravensdown Ltd	S310/042	Rule R42	Support	There should be provision for primary production until such time as the Whaitua processes are complete	Accept the submission
Dairy NZ and Fonterra Co-operative Group Ltd	S316/096	Rule R 48	Support	The submitter seeks that condition a) is that the discharge should not be directly into a site identified in Schedule A. This is supported as it provides greater certainty as to how the rule will apply.	Accept the submission
The Oil Companies	S55/050	Rule R54	Support	The changes sought consider the scale of the activity which is appropriate.	Accept the submission
The Oil Companies	S55/051	Rule R55	Support in part	The submitter seeks to redraft the rule. Horticulture NZ supports the deletion of the time limit as it is not practical and would limit future investigations by requiring resource consents. However Horticulture NZ seeks that the rule retains focus on those contaminated sites that are likely to have significant adverse effects.	Accept the submission to delete R 55 a).

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Fertiliser Assoc	S302/068	5.3.6 Fertiliser and animal effluent New rule	Support	The new rule provides for an RDA where Rule 82 cannot be met. This is an effects based approach.	Accept the submission
Regional Public Health	S136/018	Rule R82	Oppose	Fertiliser can be applied to areas where there are elevated nitrate groundwater levels – the issue is how the adverse effects are being managed – rather than requiring a blanket limitation.	Reject the submission
Ravensdown Ltd	S310/046	Rule R85	Support	The submitter seeks that condition c) is deleted. Nitrogen loads are addressed in other rules so shouldn't be included in Rule R85.	Accept the submission
Masterton District Council	S367/116	Rule R89	Support	A limitation of 20ha does not provide for smaller rural properties, such as horticultural blocks. 4ha is more appropriate	Accept the submission
Federated Farmers	S352/201	Rule R89	Support	The addition of "or farm properties under the same ownership" provides for where an operation may manage a number of properties.	Accept the submission
Beef and Lamb	S311/018	Rule R94	Oppose in part	A vegetated buffer is one mechanism to manage potential for sediment to enter water, but should not be required as other mechanisms may be more appropriate, as sought by Horticulture NZ.	Accept the Horticulture NZ submission to amend Rule R94.
Fish and Game	S308/099	Rule R94	Oppose in part	The submitter seeks permitted activities are only applied where clear measureable and enforceable standards are able to be set which ensure that s70 RMA is met, and that significant adverse effects will not occur. It is unclear what standards are sought for Rule R94. Horticulture NZ has sought changes to the rule to ensure that good management practices are used to minimise potential sediment runoff to surface water.	Accept the Horticulture NZ submission to amend Rule R94.

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
Federated Farmers	S352/205	Rule R94	Support in part	The submitter seeks the addition of a condition that “does not cause conspicuous change in colour or clarity beyond the zone of reasonable mixing”. This may assist as a measure of the effects of the activity.	Accept the Horticulture NZ submission to amend Rule R94 and consider the Federated Farmers submission as a measure of the effects of the activity.
Federated Farmers	S352/209	Rule R99	Support in part	The application of Rule R99 is determined by the relevant definitions, which are subject to submissions. Horticulture NZ supports or seeks changes to such definitions to ensure that Rule R99 is practical and effects based.	Accept submission.
Federated Farmers	S352/210	Rule R100	Support in part	The application of Rule R100 is determined by the relevant definitions, which are subject to submissions. Horticulture NZ supports or seeks changes to such definitions to ensure that Rule R100 is practical and effects based.	Accept submission.
Meridian Energy Ltd	S82/031	Rule R101	Support	An RDA rule with clear matters of discretion as sought by the submitter where Rule R100 cannot be met is supported	Accept submission.
Irrigation NZ	S306/018	5.6.2 Take and use of water New rule	Support	The submitter seeks a new RDA rule with clear matters of discretion for where a replacement consent is sought for an existing take. This is supported	Accept submission.
Federated Farmers	S352/271	Schedule C	Support	The additional details sought by the submitter are necessary to determine the relevance of the respective sites.	Accept submission.
Wairarapa Water User's Incorporated Society	S124/031	Schedule Q	Oppose	Not all water takes in the Wellington Region are in Wairarapa	Reject submission
Fish and Game	S308/080	Schedule Q	Oppose	The submitter seeks changes to ensure that water takes are efficient. The Plan has provisions to assess efficiency.	Reject the submission by Fish and Game to amend Schedule Q
Fish and Game	S308/150	Schedule Q	Oppose in part	Horticulture NZ supports efficient use of water. The submitter seeks that takes and uses of water are first necessary, second reasonable and, where they are both necessary and reasonable, are used efficiently. Include	Ensure that assessment of efficiency encompasses all aspects of efficiency, not just technical efficiency.

Submitter Name	Submission No	Plan Provision	Support/ Oppose	Reason	Relief sought
				numerical standards to define what is meant by efficient and which defines technical efficiency. Efficiency includes economic and dynamic efficiency, not just technical efficiency. A consideration of all aspects of efficiency will address matters raised by the submitter.	
Wairarapa Water User's Incorporated Society	S124/032	Schedule R	Support	The addition of stock drinking water and rootstock protection implements the policies	Accept the submission