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

 \boxtimes I do wish to be heard in support of my further submission; and, if so,

submission at any hearing.

A. DETAILS OF TORTHER SOBMITTER
FULL NAME
Wairarapa Regional Irrigation Trust
ORGANISATION (* the organisation that this submission is made on behalf of)
ADDRESS FOR SERVICE (INCLUDING POSTCODE)
c/o Grow Wellington
316 Queen Street
PO Box 920
Masterton Attention Geoff Copps
7 Martiners Cook Coppe
PHONE FAX
06 370 3290/ 021 638 629
EMAIL
geoff.copps@growwellington.co.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. The Wairarapa Regional Irrigation Trust was established in 2007 to promote the development of irrigated land use in
Wairarapa.
It introduced the Wairarapa Water Use Project to GWRC and remains an integral part of that project the project is
Governance Group, Stakeholder Advisory Group and Leadership Group. The Trust therefore represents a relevant aspect of
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 serve on each original submitter.
Signature: Date:
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 would be prepared to consider presenting this further submission in a joint case with others making a similar further

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 Name of person/ group making original submission and postal address.	Original submission number The original submission number can be found on the submitter address list.	Position Whether you support or oppose the submission.	Part(s) of the submission you support or oppose Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions.	Reasons Why you support or oppose each submission point.	Relief sought The part or whole of each submission point you wish to be allowed or disallowed.
e.g. Joanne Bloggs 12 Pine Tree Avenue Redwood	e.g. submitter S102	e.g. Oppose	e.g. Oppose all of submission point S102/41	e.g. The submission point does not recognise	e.g. Disallow the parts of \$102/41 relating to
Federated Farmers	S352	Support	S352/059 Objective O8 Allocation regime.	The submission recognises that storage as well as taking and use of water is recognised and provided for.	Allow submission
Rangitāne o Wairarapa Inc	S279	Oppose	S279/019 deletion of Objective 8	It is appropriate that the social, economic, cultural and environmental benefits of taking and using water are recognised and provided for. The framework for the consideration of adverse environmental effects is provided in other Objectives	Disallow submission
Royal Forest and Bird Protection Society	S353	Oppose	S353/017 deletion of Objective 8	It is appropriate that the social, economic, cultural and environmental benefits of taking and using water are recognised and provided for. The framework for the consideration of adverse environmental effects is provided in other Objectives	Disallow submission
Irrigation New Zealand Incorporated	S306	Support	S306/001 Objective 8	It is appropriate to include storage as a beneficial use of water,	Allow 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
Fish and Game	S308	Oppose in part	S308/17 Objective O8. Oppose all of submission point	It is appropriate that the social, economic, cultural and environmental benefits of taking and using water are recognised and provided for. The framework for the consideration of adverse environmental effects is provided in other Objectives	Disallow submission
Fish and Game	S308	Oppose	S308/083 4. Policies Include new policies and rules to ensure that water takes and use are managed in an integrated manner with water quality and the impacts of the land use on aquatic ecosystems processes and the in stream and recreational values of freshwater, and that this informs whether or not permitted activity status is appropriate and also decision making in relation to consented activities.	Oppose as it is not possible to determine the implications of the policies and rules without precise wording. Aside from the matters that WRIT has made submissions on it is considered that the policies and rules are sufficient to enable the evaluation of positive and adverse effects.	Disallow submission
NZTA	S146	Support	S146/075 New Policy Add a new policy: Adverse effects shall generally be managed by: (a) Avoiding effects; (b) Where effects cannot be practically avoided, remedying them; (c) Where effects cannot be practically remedied, mitigating them; and, (d) Where residual adverse effects remain, it may be appropriate to consider the use of off-sets.	The cascading approach to effects assessment is supported.	Allow 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
Federated Farmers	S352	Support	S352/128 Beneficial Use and Development [NEW Policy] - drainage infrastructure - The use and maintenance of drainage systems to provide the required outfall and water table levels for agricultural productivity and to protect from flooding are beneficial and shall generally be enabled	Support recognition of routine farming practices.	Allow submission
Irrigation New Zealand Incorporated	S306	Support	S306/004 Amend Policy P7 as follows: The cultural, environmental, social and(h) water storage and distribution infrastructure, and (i) irrigation, and (j) stock water, and	Support recognition that water storage is beneficial use and development.	Allow submission
Royal Forest and Bird Protection Society	S353	Oppose	S353/067 Policy P26: Natural processes. Replace P26 with: Use and development will avoid significant adverse effects on natural processes. In relation to adverse effects on natural processes that are not significant: (a) these are avoided in the first instance; (b) where they cannot be avoided, they are remedied; (c) where they cannot be remedied they are mitigated; and (d) residual adverse effects	The submitters wording makes avoidance of adverse effects the only choice for a decision maker if there are significant adverse effects. Remedy, mitigation or offset are only available if adverse effects are not significant. This wording is akin to a prohibition if significant adverse effects cannot be avoided. It is considered that this approach cannot be justified without some test of the importance of the natural process(es) in question, so as to link the regulatory response both to the importance of the natural process(es) and the nature and scale of adverse effects on those processes	Disallow 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
			that cannot be mitigated, are offset.		
Fish and Game	S308	Oppose	S308/061 Policy P96 Include policies which ensure that [outcomes relating to water allocation, nitrogen leaching rates, nutrient budgets, livestock exclusion, intensified use in over-allocated catchments, nitrogen and phosphorous trading, and costs of reducing over-allocation are achieved; see original submission p46-47 for details].	The submitter seeks an extensive range of additional policies. Apart from the matters considered in WRIT submissions it is considered that the remainder of the plan provisions are of sufficient detail to assist with managing land and water.	Disallow submission
Fish and Game	S308	Oppose	S308/069 Policy P102: Reclamation or drainage of the beds of lakes and rivers Delete. Reclamation or drainage of the beds of rivers and lakes should be prohibited	Reclamation activities or drainage should be able to be contemplated for beneficial activities and not be prohibited.	Disallow submission
Fish and Game	S308	Partial Support/partial opposition	S308/073 Policy p111 Water takes at minimum flows and water levels. Amend policies	Support the 6 th bullet point supporting storage in times of high flow. Otherwise oppose remainder of submission point is opposed as WRIT considers that the balance between water use and environmental effects is appropriately provided for in the policy framework.	Partially allow submission on bullet point 6. Otherwise disallow submission