

Proposed Natural Resources Plan:

Submitter:

Regional Public Health

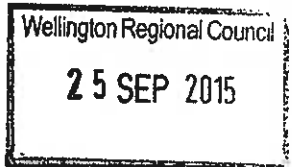
Submitter Number:

S136



25 September 2015

Greater Wellington Regional Council
PO Box 11646
Manners Street
Wellington 6142
regionalplan@gw.govt.nz



Re: Proposed Natural Resources Plan

Thank you for the opportunity to provide a written submission on this consultation document.

Regional Public Health serves the greater Wellington region, through its three district health boards (DHBs): Capital and Coast, Hutt Valley and Wairarapa and as a service is part of the Hutt Valley District Health Board.

We work with our community to make it a healthier safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff includes a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.

The reason for this submission is to ensure that the public health risks associated with the Regional Plan objectives, policies and rules are considered. The Ministry of Health requires us to reduce potential health risks by various means, which includes making submissions on resource management matters.

We are happy to provide further advice or clarification on any of the points raised in our written submission. We request to be heard in support of our written submission. The contact point for this submission is:

Campbell Gillam
Health Protection Officer
Email: Campbell.Gillam@wairarapa.dhb.org.nz
Tel: 06 377 9111

Kind regards

A handwritten signature in black ink, appearing to read "Jill McKenzie".

Dr Jill McKenzie
Medical Officer of Health

Submission on the Proposed Natural Resources Plan for the Wellington Region

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:

Send to: regionalplan@gw.govt.nz



Your details:

Full name: Dr Jill McKenzie
Company name: Regional Public Health
Address1: Private Bag 31907
Address2:
Address3:
Address4:
Town: Lower Hutt
Postcode: 5040
Telephone Work: 06 377 9134
Telephone Home:
Telephone Cell: 027 241 5906
Email address: Campbell.jilliam@wairarapa.dhb.org.nz

Trade competition

Yes /we could not gain an advantage in trade competition through this submission

No /we could gain an advantage in trade competition through this submission.

If you could gain an advantage please complete one of the following:

/we are directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

/we are not directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Attendance and wish to be heard at hearing(s)

Yes /we do wish to be heard in support of my/our submission

[Note: this means that you wish to speak in support of your submission at the hearing(s).]

No /we do not wish to be heard in support of my/our submission

[Note: this means that you cannot speak at the hearing. However, you will still retain your right to appeal any decision made by the Wellington Regional Council to the Environment Court.]

No if other make a similar submission, I will consider presenting a joint case with them at a hearing.

Date: 25/09/2015

Introduction

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

1.1 Overview of the Wellington Region	Support	
1.2 Mahitahi - a work in partnership	Support	
1.3 Guiding principles of Te Upoko Taiao	Support	
1.4 Integrated catchment management	Support	
1.5 Factors shaping this Plan	Support	
1.5.1 Statutory framework	Support	

Objectives

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Objective O1: Ki uta ki tai	Support	
Objective O2: Importance of land and water	Support	
Objective O3: Mauri	Support	
Objective O4: Intrinsic values	Support	
Objective O5: Fresh and coastal water	Support	
Objective O6: Health needs of people	Support	
Objective O7: Water for livestock	Support	
Objective O8: Allocation regime	Support	
Objective O9: Recreational values	Support	
Objective O10: Public access	Support	
Objective O11: Māori customary use	Support	

Objective O12: Benefits of regionally significant infrastructure	Support
Objective O13: Protecting regionally significant infrastructure	Support
Objective O14: Māori relationships	Support
Objective O15: Kaihakitanga	Support
Objective O16: Ngā Taonga Nui a Kiwa	Support
Objective O17: Natural character	Support
Objective O18: Low energy receiving environments	Support
Objective O19: Natural processes	Support
Objective O20: Risk from natural hazards	Support
Objective O21: High hazard areas	Support
Objective O22: Hard engineering	Support
Objective O23: Maintain or improve water quality	Support

Objective O24: Contact recreation and Māori customary use			<p>The level of Planktonic cyanobacteria for primary contact is sufficiently high to be associated with potential health risk. The level quoted should be at a minimum below the Action (red mode) found in the New Zealand Guidelines for Cyanobacteria in Recreational Freshwaters - Interim Guidelines. These should be amended to a minimum of the Alert (amber mode) if the levels of Surveillance (green mode) are not practicable as a bottom line (i.e. The cell concentration of total cyanobacteria does not exceed 500 cells/mL or biovolume equivalent for the combined total of all cyanobacteria does not exceed 0.5 mm³/L). Likewise for secondary contact the level should be below the level for Action (red mode).</p>
Objective O25: Aquatic ecosystem health and mahinga kai	Support		
Objective O26: Mahinga kai	Support		
Objective O27: Riparian margins	Support		
Objective O28: Extent of wetlands	Support		
Objective O29: Fish passage	Support		
Objective O30: Trout	Support		
Objective O31: Outstanding water bodies	Support		
Objective O32: Outstanding natural features and landscapes	Support		
Objective O33: Significant mana whenua values	Support		
Objective O34: Significant historic heritage values	Support		
Objective O35: Significant indigenous biodiversity values	Support		
Objective O36: Significant geological features	Support		
Objective O37: Significant surf breaks	Support		
Objective O38: Special amenity/landscapes	Support		
Objective O39: Ambient air quality	Support		
Objective O40: Adverse air quality	Support		
Objective O41: Nuisance discharges to air	Support		
Objective O42: Soil health and erosion	Support		
Objective O43: Contaminated land	Support		

Policies	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Policy P1: Ki uta ki tai and integrated catchment management	Support		
Policy P2: Cross-boundary matters	Support		
Policy P3: Precautionary approach	Support		
Policy P4: Minimising adverse effects	Support		
Policy P5: Review of existing consents	Support		
Policy P6: Synchronised expiry and review dates	Support		
Policy P7: Uses of land and water	Support		
Policy P8: Beneficial activities	Support		
Policy P9: Public access to and along the coastal marine area and the beds of lakes and rivers	Support		

Policy P10: Contact recreation and Māori customary use	Support
Policy P11: In-stream water storage	Support
Policy P12: Benefits of regionally significant infrastructure and renewable electricity generation facilities	Support
Policy P13: Existing regionally significant infrastructure and renewable electricity generation facilities	Support
Policy P14: Incompatible activities adjacent to regionally significant infrastructure and renewable electricity generation activities	Support
Policy P15: Flood protection activities	Support
Policy P16: New flood protection and erosion control	Support
Policy P17: Mauri	Support
Policy P18: Mana whenua relationships with Ngā Taonga Nui a Kiwa	Support
Policy P19: Māori values	Support
Policy P20: Exercise of kaitiakitanga	Support
Policy P21: Statutory acknowledgements	Support
Policy P22: Ecosystem values of estuaries	Support
Policy P23: Restoring Te Awarua-o-Porirua Harbour, Wellington Harbour (Port Nicholson), and Lake Wairarapa	Support

Policy P24: Outstanding natural character	Support
Policy P25: Natural character	Support
Policy P26: Natural processes	Support
Policy P27: High hazard areas	Support
Policy P28: Hazard mitigation measures	Support
Policy P29: Climate change	Support
Policy P30: Natural buffers	Support
Policy P31: Aquatic ecosystem health and mahinga kai	Support
Policy P32: Adverse effects on aquatic ecosystem health and mahinga kai	Support
Policy P33: Protecting indigenous fish habitat	Support
Policy P34: Fish passage	Support
Policy P35: Restoring fish passage	Support
Policy P36: Effects on indigenous bird habitat	Support
Policy P37: Values of wetlands	Support
Policy P38: Restoration of wetlands	Support
Policy P39: Adverse effects on outstanding water bodies	Support
Policy P40: Ecosystems and habitats with significant indigenous biodiversity values	Support
Policy P41: Managing adverse effects on ecosystems and habitats with significant indigenous biodiversity values	Support
Policy P42: Protecting and restoring ecosystems and habitats with significant indigenous biodiversity values	Support
Policy P43: Restoration and management plans	Support
Policy P44: Protection and restoration of sites with significant mana whenua values	Support
Policy P45: Managing adverse effects on sites with significant mana whenua values	Support
Policy P46: Managing adverse effects on sites with significant historic heritage value	Support
Policy P47: Appropriate demolition	Support
Policy P48: Protection of outstanding natural features and landscapes	Support
Policy P49: Use and development adjacent to outstanding natural features and landscapes and special amenity landscapes	Support
Policy P50: Significant geological features	Support
Policy P51: Significant surf breaks	Support

Policy P52: Managing ambient air quality	Support
Policy P53: Domestic fires	Support
Policy P54: Open fires	Support
Policy P55: Managing air amenity	Support
Policy P56: Outdoor burning	Support
Policy P57: Burning of specified materials	Support
Policy P58: Industrial discharges	Support
Policy P59: Industrial point source discharges	Support
Policy P60: Agrichemicals and fumigants	Support
Policy P61: National Environmental Standard for Air Quality	Support
Policy P62: Promoting discharges to land	Support
Policy P63: Improving water quality for contact recreation and Māori customary use	Support
Policy P64: Mixing waters	Support
Policy P65: Minimising effects of nutrient discharges	Support
Policy P66: National Policy Statement for Freshwater Management: requirements for discharge consents	Support
Policy P67: Minimising effects of discharges	Support
Policy P68: Inappropriate discharges to water	Support
Policy P69: Human drinking water supplies	Support
Policy P70: Managing point source discharges for aquatic ecosystem health and mahinga kai	Support
Policy P71: Quality of discharges	Support
Policy P72: Zone of reasonable mixing	Support
Policy P73: Minimising adverse effects of stormwater discharges	Support
Policy P74: First-stage local authority network consents	Support
Policy P75: Second-stage local authority network consents	Support
Policy P76: Minimising wastewater and stormwater interactions	Support
Policy P77: Assessing resource consents to discharge stormwater containing wastewater	Support
Policy P78: Managing stormwater from large sites	Support

Policy P79: Managing land use impacts on stormwater	Support
Policy P80: Replacing wastewater discharge consents	Support
Policy P83: Avoiding new wastewater discharges to fresh water	Support
Policy P84: On-site domestic wastewater management	Amend
Policy P85: Biosolids and treated wastewater to land	Support
Policy P86: Discharge of wastewater from vessels	Support
Policy P87: Minimising adverse effects of wastewater discharges from vessels and offshore installations	Support
Policy P80: Replacing wastewater discharge consents	Support
Policy P82: Mana whenua values and wastewater discharges	Support
Policy P88: Bio foul cleaning	Support
Policy P89: Discharges from contaminated land	Support
Policy P90: Discharges of hazardous substances	Support
Policy P90: Discharges of hazardous substances	Support
Policy P92: Discharges from hydraulic fracturing	Support
Policy P91: Landfills	Support
Policy P93: Disposal of hydraulic fracturing chemicals or materials	Support
Policy P94: Discharge of collected animal effluent	Support
Policy P95: Discharges to land	Support
Policy P96: Managing land use	Support
Policy P97: Managing sediment discharges	Support
Policy P98: Accelerated soil erosion	Support
Policy P99: Livestock access to surface water bodies	Support
Policy P100: Riparian margins for cultivation and break-feeding	Support

Regional Public Health believes that this policy should reflect that discharge to land of contaminants should be avoided when alternatives of lower public health risk are available.

That the policy wording be amended to add "New on-site domestic wastewater systems shall be avoided in areas where a reticulated sewer connection is available."

Policy P101: Management of riparian margins	Support
Policy P102: Reclamation or drainage of the beds of lakes and rivers	Support
Policy P103: Management of gravel extraction	Support
Policy P104: Effects on catchment-based flood and erosion control activities	Support
Policy P105: Protecting trout habitat	Support
Policy P106: Management of plants in the beds of lakes and rivers	Support
Policy P107: The framework for taking and using water	Support
Policy P108: Integrating groundwater and surface water	Support
Policy P110: National Policy Statement for Freshwater Management requirements for water takes, damming and diversion	Support
Policy P111: Water takes at minimum flows and water levels	Support
Policy P113: Core allocation for rivers	Support
Policy P112: Priorities in drought and serious water shortage	Support
Policy P113: Core allocation for rivers	Support
Policy P114: Priorities when demand exceeds supply	Support
Policy P115: Authorising takes below minimum flows and lake levels	Support
Policy P116: Reallocating water	Support
Policy P117: Supplementary allocation amounts at flows above the median flow	Support
Policy P118: Reasonable and efficient use	Support
Policy P119: Unused water	Support
Policy P120: Taking water for storage	Support
Policy P121: Preventing salt water intrusion	Support
Policy P122: Flow variability	Support
Policy P123: Direct, cumulative adverse effects	Support
Policy P124: Surface water intakes	Support
Policy P126: Site dewatering	Support
Policy P127: Backflow of contaminants	Support
Policy P128: Transfer of resource consents	Support
Policy P129: Minimum flows and water levels	Support

Policy P130: Bores	Support
Policy P131: Bores no longer required	Support
Policy P132: Functional need and efficient use	Support
Policy P133: Recreational values	Support
Policy P134: Public open space values and visual amenity	Support
Policy P135: Safe passage	Support
Policy P136: Hutt Valley aquifer zone in Wellington Harbour (Port Nicholson)	Support
Policy P137: Airport height restriction areas	Support
Policy P138: Structures in sites with significant values	Support
Policy P139: Seawalls	Support
Policy P140: Boatshed Management Areas	Support
Policy P141: Boatsheds	Support
Policy P142: Lambton Harbour Area	Support
Policy P143: Deposition in a site of significance	Support
Policy P144: Dumping in a site with significant values	Support
Policy P145: Reclamation, drainage and destruction	Support
Policy P146: Introduction of pest plants	Support
Policy P147: Motor vehicles on the foreshore	Support
Policy P148: Motor vehicles in sites with significant value	Support
Policy P149: Protection of the Tīrahi Bay fossil forest	Support
Policy P150: Noise and lighting	Support

Rules - Air quality	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Rule R1: Outdoor burning – permitted activity	Support		
Rule R2: Frost prevention devices – permitted activity	Support		
Rule R3: Outdoor burning for firefighter training – permitted activity	Support		
Rule R4: Pyrotechnics – permitted activity	Support		
Rule R5: Outdoor burning of specified materials – prohibited activity	Support		
Rule R6: Fuels prohibited in domestic fires – prohibited activity	Support		
Rule R7: Natural gas and liquefied petroleum gas – permitted activity	Support		
Rule R8: Diesel or kerosene – permitted activity	Support		
Rule R9: Biogas – permitted activity	Support		
Rule R10: Untreated wood – permitted activity	Support		
Rule R11: Coal, light fuel oil, and petroleum distillates – permitted activity	Support		
Rule R12: Emergency power generators – permitted activity	Support		

Rule R13: Fuels not permitted in large scale generators – non-complying activity	Support
Rule R14: Spray coating within an enclosed space – permitted activity	Amend
Rule R15: Spray coating not within an enclosed space – permitted activity	Amend
Rule R16: Printing processes – permitted activity	Support
Rule R17: Dry cleaning – permitted activity	Support
Rule R18: Fume cupboards – permitted activity	Support
Rule R19: Workplace ventilation – permitted activity	Support
Rule R20: Mechanical processing of metals – permitted activity	Support
Rule R21: Thermal metal spraying – permitted activity	Support
Rule R22: Metallurgical or chemical processing of metal – discretionary activity	Support
Rule R23: Crematoria – discretionary activity	Support
Rule R24: Flaring of gas – discretionary activity	Support

Regional Public Health supports the intention of this rule however we believe that surface coatings such as iso-cyanates should have an exclusion distance to sensitive receiving activities or areas.

That the proposed rule wording is amended by the addition of a further clause "(g) That the emission is 20 meters from a sensitive activity or sensitive area."

Regional Public Health supports the intention of this rule however we believe that surface coatings such as iso-cyanates should have an exclusion distance to sensitive receiving activity or areas. We have had to manage health concerns with spray painting premises impacting on nearby residences and early childhood centres in the past.

That the wording of proposed rule (c) is amended to read: "The discharge shall be located at least 20 meters from a sensitive activity or sensitive areas."

Rule R25: Abrasive blasting within an enclosed booth – permitted activity	Support
Rule R26: Abrasive blasting outside an enclosed area – permitted activity	Support
Rule R27: Handling of aggregate – permitted activity	Support
Rule R28: Cement storage – permitted activity	Support
Rule R29: Alcoholic beverage production – permitted activity	Support
Rule R31: Food, animal or plant matter manufacturing and processing – discretionary activity	Support
Rule R32: Petroleum storage or transfer facilities – permitted activity	Support
Rule R33: Mobile source emissions – permitted activity	Support
Rule R34: Gas, water and wastewater – permitted activity	Support
Rule R35: Drying and heating of minerals – permitted activity	Support
Rule R36: Agrichemicals – permitted activity	Support
Rule R37: Agrichemicals into water – permitted activity	Amend
Rule R38: Agrichemicals not permitted – discretionary activity	Support
Rule R39: Fumigation – permitted activity	Support

Regional Public Health believes that aligning the notification period for both community drinking water protection area abstraction permit holders and others is appropriate.

That Rule 37 (f) be amended to delete the words 12 hours and insert the words one week.

Rule R40: Discharge of other fumigants – controlled activity	Amend
Rule R41: All other discharges – discretionary activity	Support

believes that the rule should reflect the 2010 Environmental Risk Management Authority Decision Methyl Bromide Reassessment.

of a new item 3 to Matters of Control "In the case of application for use of methyl bromide the extent of re-capture technology."

Rules - Discharges to water

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Rule R42: Minor discharges – permitted activity	Support		
Rule R43: Water to water – permitted activity	Support		
Rule R44: Pool and spa pool water – permitted activity	Support		
Rule R45: Potable water – permitted activity	Support		
Rule R46: Dye or salt tracer – permitted activity	Support		
Rule R48: Stormwater from an individual property – permitted activity	Support		
Rule R49: Stormwater to land – permitted activity	Support		
Rule R50: Stormwater from a local authority network at plan notification – controlled activity	Support		
Rule R51: Stormwater from a local authority network two years after public notification – restricted discretionary activity	Support		
Rule R52: Stormwater from large sites – restricted discretionary activity	Support		
Rule R53: All other stormwater – discretionary activity	Support		
Rule R54: Site investigation – permitted activity	Support		

Regional Public Health supports the proposed rule but suggests that wording be altered to clarify the intent.

That the proposed rule (b) (i) be amended to read "the concentration of contaminants in groundwater meets the Drinking Water Standards New Zealand 2005 (Revised 2008)"

Rule R55: Discharges from contaminated land – permitted activity	Amend
Rule R56: Discharges from contaminated land – discretionary activity	Support
Rule R57: Discharge of hazardous substances – non-complying activity	Support
Rule R58: Water races – discretionary activity	Support
Rule R59: Existing pumped drainage schemes	Support
Rule R60: All other pumped drainage schemes – discretionary activity	Support
Rule R61: Existing wastewater – discretionary activity	Support
Rule R62: New wastewater to fresh water – non-complying activity	Support
Rule R63: Wastewater from ships and offshore installations – permitted activity	Support
Rule R64: Wastewater from ships and offshore installations – non-complying activity	Support
Rule R65: In-water biofoul cleaning – permitted activity	Support
Rule R66: In-water biofoul cleaning – discretionary activity	Support
Rule R67: Discharges inside sites of significance – non-complying activity	Support
Rule R68: All other discharges – discretionary activity	Support

Rules - Discharges to land	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Rule R69: Minor contaminants – permitted activity	Support		
Rule R70: Cleanfill material – permitted activity	Support		
Rule R71: Pit latrine – permitted activity	Support		
Rule R72: Composting toilets – permitted activity	Amend	Composted toilet waste should not be applied to human or animal food crops.	That Rule 72 is amended by adding a note after clause (d) "Permission may be required from the relevant authority in respect of the discharge under other legislation or bylaws."
Rule R73: Greywater – permitted activity	Amend	Untreated greywater can present a potential public health risk for contamination of drinking water sources.	That clause (c) wording is amended to state that the discharge is not located within "20 meters of a surface water body, coastal marine area, gully, or a minimum of 20 meters of a bore used for water extraction for potable supply as determined by a site risk assessment". That clause (b) is amended to "the application rate of greywater shall not exceed a maximum daily volume of 2,000 litres and is site appropriate, and"
Rule R74: Existing on-site wastewater systems – permitted activity	Support		
Rule R75: New or upgraded on-site wastewater systems – permitted activity	Amend	Regional Public Health supports the intent of the proposed rule. We believe however that as with Rule 71 that a new on-site wastewater system shall only be a permitted activity where a sewer connection is unavailable. Regional Public Health are also concerned regarding the protection of drinking water supplies that are outside of a community drinking water supply protection area.	That the wording of the proposed rule is amended to insert a new clause "(f) in the case of a new system, where a sewer connection is available". That the wording of the proposed rule clause (e)(i) is amended to "20 meters of a surface water body, coastal marine area, gully, or a minimum of 20 meters of a bore used for water abstraction for potable supply as determined by a site risk assessment, or"

<p>Rule R76: New or upgraded on-site wastewater systems within community drinking water supply protection areas – controlled activity</p>		<p>Amend</p>	<p>Regional Public Health supports the intent of the proposed rule. We believe however that as with Rule 71 that a new on-site wastewater system shall only be a permitted activity where a sewer connection is unavailable.</p>
<p>Rule R77: Application of Aa biosolids to land – permitted activity</p>		<p>Amend</p>	<p>Regional Public Health believes that the determination of adequate buffer zones between discharge activities and drinking water abstraction bores needs to be site specific and the subject of an individual risk assessment (as per Policy 69). Regional Public Health believes that a 20 meter buffer should be considered as a minimum only when risk is assessed as low.</p>
<p>Rule R78: Application of biosolids (Ab, Ba, or Bb) to land – restricted discretionary activity</p>		<p>Amend</p>	<p>Regional Public Health believes that the long term application of biosolids to land needs to consider the future potential effects of emerging contaminants.</p>
<p>Rule R79: Discharge of treated wastewater – controlled activity</p>		<p>Support</p>	<p>That the rule is amended by adding a new clause 10 Matters for discretion: "Measures for monitoring emerging contaminants".</p>
<p>Rule R80: Discharge of treated wastewater – restricted discretionary activity</p>		<p>Support</p>	<p>That the rule be amended to read "(a) the discharge is not located within 20 meters of a surface water body, the coastal marine area, gully, or a minimum of 20 meters of a bore used for water abstraction for potable supply as determined by a site risk assessment, and"</p>
<p>Rule R81: Drinking water treatment plant supernatant waste – controlled activity</p>		<p>Amend</p>	<p>Regional Public Health believes that the determination of adequate buffer zones between discharge activities and drinking water abstraction bores needs to be site specific and the subject of an individual risk assessment. Regional Public Health believes however that a 20 meter buffer should be considered as a minimum.</p>
<p>Rule R82: Application of fertiliser from ground-based or aerial application – permitted activity</p>		<p>Amend</p>	<p>High nitrate levels in ground water can have adverse effects on human health through consumption of contaminated drinking water supplies. The definition of elevated groundwater nitrate levels should reflect the New Zealand Drinking Water Standards 2005 (Revised 2008).</p> <p>That the wording of proposed rule be amended by inclusion of a new clause "(d) the discharge is not to an area with existing elevated groundwater nitrate levels."</p>

Rule R83: Discharge of collected animal effluent onto or into land – controlled activity	Amend
Rule R84: Discharge of collected animal effluent to water – non complying activity	Support
Rule R85: Application of compost to land – permitted activity	Support
Rule R87: Land-based discharge of vertebrate toxic agents – permitted activity	Support
Rule R88: Aerial application of vertebrate toxic agents – controlled activity	Support
Rule R89: Farm refuse dumps – permitted activity	Support
Rule R90: Manufacture and storage of silage and compost – permitted activity	Support
Rule R91: Ofal pit – permitted activity	Amend
Rule 92: All discharges to land within community drinking water protection areas – restricted discretionary activity	Support
Rule R93: All other discharges to land – discretionary activity	Support

Regional Public Health believes that the activity has potential public health risks from microbiological exposure and increase in groundwater nitrate levels.

That the rule is amended to include a new clause 9 to matters of control stating "The maximum application rate reflects the background ground water nitrate concentration."

Regional Public Health supports the intent of drinking water protection area provisions and believes that there is potential for the operation of ofal pits to have an adverse impact on potable groundwater drinking water supplies and that the effects of the activity should be the subject of a site specific risk assessment.

That the wording of the proposed rule is amended by adding a clause (i) the ofal pit is located outside of a community drinking water protection area as shown on Map 26, Map 27a, map 27b or Map 27c.

Rules - Land use

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Rule R94: Cultivation or tilling of land – permitted activity	Support		
Rule R95: Break-feeding – permitted activity	Support		
Rule R96: Cultivation and break-feeding – discretionary activity	Support		
Rule R97: Access to the beds of surface water bodies by livestock – permitted activity	Support		
Rule R98: Livestock access to the beds of surface water bodies – discretionary activity	Support		
Rule R99: Earthworks–permitted activity	Support		
Rule R100: Vegetation clearance on erosion prone land – permitted activity	Support		
Rule R101: Earthworks and vegetation clearance – discretionary activity	Support		
Rule R103: Plantation forestry harvesting – controlled activity	Support		
Rule R103: Plantation forestry harvesting – controlled activity	Support		

Rules - Wetlands and beds of lakes and rivers

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Wetlands general conditions	Support	
Rule R104: Structures in natural wetlands and significant natural wetlands – permitted activity	Support	
Rule R105: Planting and pest plant control in natural wetlands, significant natural wetlands and outstanding natural wetlands – permitted activity	Support	
Rule R106: Restoration of natural wetlands, significant natural wetlands and outstanding natural wetlands – controlled activity	Support	
Rule R107: Activities in natural wetlands and significant natural wetlands – discretionary activity	Support	
Rule R108: Activities in natural wetlands and significant natural wetlands – non-complying activity	Support	
Rule R109: Activities in outstanding natural wetlands – discretionary activity	Support	
Rule R110: Activities in outstanding natural wetlands – non-complying activity	Support	
Rule R111: Reclamation of outstanding natural wetlands – prohibited activity	Support	
Rule R112: Maintenance, repair, replacement, upgrade or use of existing structures (excluding the Barrage Gates) – permitted activity	Support	
Rule R113: Diversion of flood water by existing structures – permitted activity	Support	
Rule R114: River crossing structures – permitted activity	Support	

Rule R115: Culverts – permitted activity	Support
Rule R116: Establishing a small dam and existing dams – permitted activity	Support
Rule R117: New structures – permitted activity	Support
Rule R118: Removing or demolishing structures – permitted activity	Support
Rule R119: Clearing flood debris and beach recontouring – permitted activity	Support
Rule R120: Minor sand and gravel extraction – permitted activity	Support
Rule R121: Maintenance of drains – permitted activity	Support
Rule R122: Removing vegetation – permitted activity	Support
Rule R123: Planting – permitted activity	Support
Rule R124: Entry or passage over bed (excluding livestock access) – permitted activity	Support
Rule R125: Structures within a site identified in Schedule C (mana whenua) – restricted discretionary activity	Support
Rule R126: Placement of a dam in an outstanding water body – non-complying activity	Support
Rule R127: Reclamation of the beds of rivers or lakes – non-complying activity	Support
Rule R128: Reclamation of the bed of an outstanding lake and associated diversion – prohibited activity	Support

Rules - Water allocation

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Rule R136: Take and use of water – permitted activity	Support	
Rule R137: Farm dairy washdown and milk-cooling water – permitted activity	Support	
Rule R138: Water races – permitted activity	Support	
Rule R139: Pumping test – permitted activity	Support	
Rule R140: Dewatering – permitted activity	Support	
Rule R141: Take and use of water not permitted – controlled activity	Support	
Rule R142: All other take and use – discretionary activity	Support	
Rule R143: Temporary water permit transfers – controlled activity	Support	
Rule R144: Transferring water permits – restricted discretionary activity	Support	
Rule R145: Transferring water permits – discretionary activity	Support	
Rule R146: Geotechnical investigation bores – permitted activity	Support	
Rule R147: Drilling, construction or alteration of any bore – controlled activity	Support	

Rule R148: Drilling, construction or alteration of any bore – discretionary activity	Support

Rules - Coastal management

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Coastal management general conditions	Support	
Rule R149: Maintenance or repair of structures – permitted activity	Support	
Rule R150: Minor additions or alterations to structures – permitted activity	Support	
Rule R151: Additions or alterations to structures – controlled activity	Support	
Rule R152: Removal or demolition of structures or part of a structure – permitted activity	Support	
Rule R153: Removal or demolition of a structures or part of a structure – restricted discretionary activity	Support	
Rule R153: Removal or demolition of a structures or part of a structure – restricted discretionary activity	Support	
Rule R154: New temporary structures outside sites of significance – permitted activity	Support	
Rule R155: New temporary structures – restricted discretionary activity	Support	
Rule R156: New or replacement navigation aids – permitted activity	Support	
Rule R157: New or replacement structures for scientific or education purposes – controlled activity	Support	
Rule R158: Structures in airport height restriction areas or navigation protection areas for airport/navigation purposes or navigation	Support	

Rule R158: Structures in airport height restriction areas or navigation protection areas for airport/navigation purposes, or navigation	Support
Rule R159: Structures in airport height restriction areas or navigation protection areas – prohibited activity	Support
Rule R160: Structures and disturbance associated with motor vehicles inside the Cook Strait Cable Protection Zone – discretionary activity	Support
Rule R161: New structures, additions or alterations to structures outside sites of significance – discretionary activity	Support
Rule R162: New structures, additions or alterations to structures inside sites of significance – non-complying activity	Support
Rule R163: Replacement of structure or parts of structures – permitted activity	Support
Rule R164: Replacement of structures – restricted discretionary activity	Support
Rule R165: Additions or alterations to existing seawalls – controlled activity	Support
Rule R166: Seawalls outside sites of significance – discretionary activity	Support
Rule R167: Seawalls inside sites of significance – non-complying activity	Support
Rule R168: Alteration of structures identified in Schedule E2 or Schedule E3 – permitted activity	Support
Rule R169: Additions or alterations to structures identified in Schedule E1 and or Schedule E2 – restricted discretionary activity	Support
Rule R170: Additions to structures identified in Schedule E3 – permitted activity	Support

Rule R171: Additions or alterations to structures identified in Schedule E1, Schedule E2 or Schedule E3 – discretionary activity	Support
Rule R172: Removal, demolition or replacement of a structure or part of a structure identified in Schedule E1, Schedule E2 or Schedule E3 – discretionary activity	Support
Rule R173: Additions or alterations to structures inside the Commercial Port Area – permitted activity	Support
Rule R175: New structures associated with passenger and cargo handling inside the Commercial Port Area – permitted activity	Support
Rule R176: Use of boatsheds – permitted activity	Support
Rule R177: Change of use of boatsheds – non-complying activity	Support
Rule R178: New boatsheds inside Boatshed Management Areas – discretionary activity	Support
Rule R179: New boatsheds outside Boatshed Management Areas – non-complying activity	Support
Rule R180: New swing moorings inside Mooring Areas – permitted activity	Support
Rule R181: New swing moorings outside Mooring Areas – non complying activity	Support
Rule R182: Occupation of space by a structure owned by a network utility operator – permitted activity	Support
Rule R183: Renewal of existing resource consents for occupation of space by structures – controlled activity	Support
Rule R184: Occupation of space – discretionary activity	Support
Rule R185: General surface water and foreshore activities – permitted activity	Support
Rule R186: General surface water and foreshore activities – restricted discretionary	Support
Rule R187: General surface water and foreshore activities – discretionary activity	Support
Rule R188: Minor disturbances – permitted activity	Support

Other methods	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Method M1: Regional plan implementation and integration	Support		
Method M2: Kaitiaki information and monitoring strategy	Support		
Method M3: Wellington regional hazards management strategy	Support		
Method M4: Sea level rise	Support		
Method M5: Polluted airsheds	Support		
Method M6: National Policy Statement for Freshwater Management strategy	Support		
Method M7: Outstanding water bodies	Support		
Method M8: Te Awarua-o-Porirua Harbour restoration	Support		
Method M9: Wairarapa Moana	Support		
Method M10: Water quality investigations and remediation actions	Support		
Method M11: Assessment and reporting of Wellington Regional Council works, operations and services for integrated catchment	Support		
Method M12: Sustainable land management practices	Support		

Method M13: Wairarapa water races	Support
Method M14: Maintenance of drains	Support
Method M15: Regional stormwater working group	Support
Method M16: Contaminated land	Support
Method M17: Reduce waste and use water and energy efficiently	Support
Method M18: Water use groups	Support
Methods 19: Water management	Support
Method M20: Wetlands	Support
Method M21: Fish passage	Support
Method M22: Integrated management of the coast	Support
Method M23: Archaeological discovery protocols	Support
Method M24: Outstanding natural features and landscapes and high natural character	Support
Method M25: Understanding and providing for mana whenua values and relationships	Support
Method M26: Encouraging the involvement of kaitiaki	Support

Ruamāhanga Whaitua

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Policy R.P.1: Minimum flows and water levels in the Ruamāhanga Whaitua	Support		
Policy R.P.1: Core allocation in the Ruamāhanga Whaitua	Support		
Policy R.P.3: Cumulative effects on river reaches of allocating water	Support		
Rule R.R.1: Take and use of water in the Ruamāhanga Whaitua - restricted discretionary activity	Support		
Rule R.R.2: Taking and using water - discretionary activity	Support		
Rule R.R.3: Take and use of water that exceeds minimum flows, lake levels or core allocation - prohibited activity	Support		

**Wellington Harbour and Hutt Valley
Whaitua**

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

	Support
Policy WH.P1: Minimum flows and water levels in the Wellington Harbour and Hutt Valley Whaitua	Support
Policy WH.P2: Core allocation in the Wellington Harbour and Hutt Valley Whaitua	Support

Te Awarua-o-Porirua Whaitua

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Policy P.P1: Minimum flows and water levels in Te Awarua-o-Porirua Whaitua	Support	
Rule P.R1: Take and use of water - discretionary activity	Support	

Kāpiti Coast Whaitua**My submission on this provision is:****Reasons for my submission:****I seek the following from WRC (give precise details):**

Policy K.P1: Minimum flows and water levels in the Kāpiti Coast Whaitua	Support		
Policy K.P2: Core allocation for rivers in the Kāpiti Coast Whaitua	Support		
Rule K.R1: Take and use of water in the Kāpiti Coast Whaitua - restricted discretionary activity	Support		
Rule K.R2: Take and use water - discretionary activity	Support		

Wairarapa Coast Whaitua

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Policy WC.P1: Minimum flows and water levels in the Wairarapa Coast Whaitua	
Rule WC.R1: Take and use of water - discretionary activity	

Regional Public Health supports the proposed policy.

Regional Public Health supports the proposed rule.

Schedules**My submission on this provision is:****Reasons for my submission:****I seek the following from WRC (give precise details):**

Schedule A: Outstanding water bodies	Support	
Schedule B: Ngā Taonga Nui a Kiwa	Support	
Schedule C: Sites with significant mana whenua values	Support	
Schedule D: Statutory Acknowledgements	Support	
Schedule E: Sites with significant historic heritage values	Support	
Schedule F: Ecosystems and habitats with significant indigenous biodiversity values	Support	
Schedule G: Principles to be applied when proposing and considering mitigation and offsetting in relation to biodiversity	Support	
Schedule H: Contact recreation and Māori customary use	Support	
Schedule I: Important trout fishery rivers and spawning waters	Support	
Schedule J: Significant geological features in the coastal marine area	Support	
Schedule K: Significant surf breaks	Support	
Schedule L: Air quality	Support	

Schedule M: Community drinking water supply abstraction points	Amend	
Schedule N: Stormwater management strategy	Support	
Schedule O: Plantation forestry harvest plan	Support	
Schedule P: Classifying and managing groundwater and surface water connectivity	Support	
Schedule Q: Reasonable and efficient use criteria	Support	
Schedule R: Guideline for stepdown allocations	Support	
Schedule S: Guideline for measuring and reporting of water takes	Support	
Schedule T: Pumping test	Support	
Schedule U: Trigger levels for river and stream mouth cutting	Support	

Regional Public Health have checked Schedule M against the Drinking Water Register for this area. We note that there are abstraction points on the Drinking Water Register, which trigger the definition of a Community Drinking Water Supply, that are not contained in Schedule M. These are Kapiti Coast District Council, Waikane/Paraparumu/Raumati (KI3-Huiawa) and Otaki (Rangiuru Road Bore); and South Wairarapa District Council, Kohunui Marae (Kohunui Marae Bore).

Regional Public Health propose that the Drinking Water Register and Schedule M, align according to the definition of a community drinking water supply abstraction point.

Maps**My submission on this provision is:****Reasons for my submission:****I seek the following from WRC (give precise details):**

Map 1: Outstanding water bodies (Schedule A1, A2, A3)	Support
Map 2: Ngā Taonga Nui a Kiwa (Schedule B)	Support
Map 3: Sites of significance to Ngā Hapū ō Ōtaki (Schedule C1)	Support
Map 4: Sites of significance to Te Ātiawa ki Whakarongotai (Schedule C2)	Support
Map 4: Sites of significance to Te Ātiawa ki Whakarongotai (Schedule C2)	Support
Map 5: Sites of significance to Ngāti Toa Rangatira (Schedule C3)	Support
Map 7: Sites of significance to Ngāti Kahungunu ki Wairarapa and Rangitāne o Wairarapa (Schedule C5)	Support
Map 8: Historic heritage structures (Schedule E1)	Support
Map 9: Historic heritage wharves and boatsheds (Schedule E2)	Support
Map 10: Historic heritage navigation aids (Schedule E3)	Support
Map 11: Archaeological sites (Schedule E4)	Support
Map 12: Historic heritage freshwater sites (Schedule E5)	Support

Map 13a: Rivers and lakes with significant indigenous ecosystems: high macroinvertebrate community health (Schedule F1)	Support
Map 13b: Rivers and lakes with significant indigenous ecosystems: habitat for indigenous threatened/at risk fish species (Schedule F1)	Support
Map 13c: Rivers and lakes with significant indigenous ecosystems: habitat for six or more migratory indigenous fish species (Schedule F1)	Support
Map 14: Known rivers and parts of the coastal marine area with inanga spawning habitat (Schedule F1b)	Support
Map 15: Lakes with significant aquatic plant communities (Schedule F1c)	Support
Map 16: Habitats for indigenous birds in rivers (Schedule F2a)	Support
Map 17: Habitats for indigenous birds in lakes (Schedule F2b)	Support
Map 18: Habitats for indigenous birds in the coastal marine area (Schedule F2c)	Support
Map 19: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4)	Support
Map 20: Significant primary contact recreation rivers and lakes (Schedule H)	Support
Map 21a: Modelled river classes – upper Wairarapa valley catchments (Table 3.1)	Support
Map 21b: Modelled river classes – middle Wairarapa valley catchments (Table 3.1)	Support
Map 21c: Modelled river classes – Lake Wairarapa and lower valley catchments (Table 3.1)	Support
Map 21d: Modelled river classes – Wellington Hutt Valley and Wainuiomata catchments (Table 3.1)	Support

Map 21e: Modelled river classes – Kāpiti Coast catchments (Table 3.1)	Support
Map 22: Trout fishery rivers and trout spawning waters (Schedule I)	Support
Map 23: Significant geological features in the coastal marine area (Schedule J)	Support
Map 24: Significant surf breaks (Schedule K)	Support
Map 25: Masterton urban airshed	Support
Map 26: Surface water community drinking water supply protection areas (incorporates Schedule M1)	Support
Map 27a: Groundwater community drinking water supply protection areas – Wairarapa (incorporates Schedule M2)	Amend
Map 27b: Groundwater community drinking water supply protection areas – Hutt Valley (incorporates Schedule M2)	Support
Map 27c: Groundwater community drinking water supply protection areas – Kāpiti Coast (incorporates Schedule M2)	Amend
Map 28: Water races in the Wairarapa	Support
Map 29: Lowland areas for Category 2 surface water bodies	Support
Map 30: Hutt Valley aquifer zone in Wellington Harbour (Port Nicholson)	Support
Map 31: Boatshed areas	Support
Map 32: Commercial port, Lambton Harbour Area & noise control lines – Lambton Harbour	Support

An amendment may be required if there is a change to Schedule M to align with the Drinking Water Register.

An amendment may be required if there is a change to Schedule M to align with the Drinking Water Register.

Map 33: Commercial port area & noise control lines – Miramar and Burnham Wharves	Support
Map 34: Commercial port area – Seaview Wharf	Support
Map 35: Titahi Bay fossil forest (indicative)	Support
Map 36: Mooring areas Wellington Harbour (Port Nicholson) – Evans Bay	Support
Map 37: Mooring areas Wellington Harbour (Port Nicholson) – Whiorau/Lowry Bay	Support
Map 38: Mooring areas Island Bay	Support
Map 39: Mooring areas Te Awarua-o-Porirua Harbour – Onepoto	Support
Map 40: Mooring areas Te Awarua-o-Porirua Harbour – Mana	Support
Map 41: Mooring areas Te Awarua-o-Porirua Harbour – Pauatahanui Arm	Support
Maps 42-48: Coastal marine area and river mouth boundaries	Support
Map 49: Navigation protection areas in Wellington Harbour (Port Nicholson)	Support
Map 49: Navigation protection areas in Wellington Harbour (Port Nicholson)	Support
Map 50: Wellington International Airport height restrictions	Support
Map 51: Kapiti Coast Airport approach gradients	Support

Map 52: Cook Strait cable protection zone

	Support

