

Submitter ID:

File No:



greater WELLINGTON  
REGIONAL COUNCIL  
Te Pane Matua Taiao

# 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](http://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](mailto:Regionalplan@gw.govt.nz)

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FreePost Authority Number 3156



Greater Wellington Regional Council  
Further Submission on Proposed Natural Resources Plan for the Wellington Region  
Freepost 3156  
PO Box 11646  
Manners Street  
Wellington 6142

## FORM 6: FURTHER SUBMISSION FORM

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

### A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Leo Vollebregt

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

Wairarapa Water User's Inc. Society

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

235 Pahautea Road,  
RD1,  
Featherston  
5771

PHONE

0272588405

FAX

EMAIL

lrvoll@xtra.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.

I am Chairman of the above Society which represents users of water who are consented to do so by Greater Wgtn Regional Council

### Service of your further submission

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

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

Signature: Leo Vollebregt

Date: 24/03/2016

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

### Please note

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

### B. APPEARANCE AT HEARING

Please select from the following:

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

Please enter further submission points in the table on the following pages

**C. FURTHER SUBMISSION POINTS**

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

<b>Details of the submission you are commenting on</b>	<b>Original submission number</b>	<b>Position</b>	<b>Part(s) of the submission you support or oppose</b>	<b>Reasons</b>	<b>Relief sought</b>
Name of person/ group making original submission and postal address.	The original submission number can be found on the submitter address list.	Whether you support or oppose the submission.	Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions.	Why you support or oppose each submission point.	The part or whole of each submission point you wish to be allowed or disallowed.
<i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood	<i>e.g.</i> submitter S102	<i>e.g.</i> Oppose	<i>e.g.</i> Oppose all of submission point S102/41	<i>e.g.</i> The submission point does not recognise...	<i>e.g.</i> Disallow the parts of S102/41 relating to...
Federated Farmers	S352	support	S352/180	This point recognises that allocations and current consents were decided on based on good evidence. When new evidence comes in that is based on solid data changes can be made.	The maximum allocation amounts for rivers (and their tributaries) and directly connected groundwater ,: (a) <u>is the current operative RFP allocations, or</u> (b) <u>consented allocation at the date of notification of the pNRP</u> <u>whichever is greater</u>
Federated Farmers	S352	support	S352/053	The point makes good sense and embodies the purpose of the objectives	Amend title to "Ki uta ki tai: <u>integrated catchment management</u> "
Dairy NZ/Fonterra	S316	support	S316/016	More accurately reflects a water way's	Amend the definition to more accurately determine the mean annual low flow as the 7 day or 5 day variant in use by hydrologists: "The mean annual low flow 7D is the average of lowest daily flows recorded over a 7-day continual flow record, derived for a water year (June-July)".
Dairy NZ/Fonterra	S316	support	S316/020	Good management of waterways	Amend the definition is as follows: "A reduction in the core amount of water allocated from a river <u>when river flows are low to protect the minimum flow.</u> "
A.J Barton and Ongaha Farms Limited	S327	support	S327/002,003,004	Fits with our earlier submissions (S124/009,030,033,036,037 and 038) on Category A,B and C	That the definitions for Category A, B and C groundwater be amended to better explain the degree of hydraulic connectivity in a way that

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
				groundwater	is clear, unambiguous, measurable, and workable. These definitions should assist in both clarifying the classification of a particular aquifer, and setting appropriate consent conditions to mitigate any potential adverse effects. The definitions and designation applied to 'zones' must recognise local variations, and the potential for such variations to cause significant differences in the 'expected' behaviour of the groundwater system
A.J Barton and Ongaha Farms Limited	S327	support	S327/005	Good wording supports our submission S124/004	That a robust economic analysis be undertaken of the potential effect of the minimum flow restrictions on the abstraction of water from Category A & B aquifers where such a restriction has not previously existed  Any economic analysis must recognise that the value of water for irrigation varies throughout the season, and is a function of the particular land use activity. The analysis presented in Harris (2015) should be revised to take account of the critical nature of water during certain periods
A.J Barton and Ongaha Farms Limited	S327	support	S327/006	Good wording supports our submission S124/031	The submitter would like to see the addition of <i>"the application of most appropriate practice"</i> .
A.J Barton and Ongaha Farms Limited	S327	support	S327/007, 008	Fits with our earlier submissions (S124/009,030,033,036,037 and 038) on Category A,B and C groundwater	That the limitations of the regional scale modelling be recognised when considering resource consents. There is significant local variation, vertical differentiation, and aquifer heterogeneity which is not incorporated in the regional modelling. These factors have a significant effect on local groundwater conditions and the interaction of surface water and groundwater

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A.J Barton and Ongaha Farms Limited	S327	support	S327/009	Objective data which must be part of a section 32 report	That the economic cost of the minimum flow restrictions on groundwater consents be weighed against any measurable environmental benefits
A.J Barton and Ongaha Farms Limited	S327	support	S327/010	This would acknowledge the investment made in infrastructure and gives users the confidence to invest in the future	That the four-year `grandparenting provision in Policy 118 be extended to 10-years.
A.J Barton and Ongaha Farms Limited	S327	support	S327/011	A clause that would fit in well with Method 18:water management	That a mechanism be provided for recognising and accommodating local variations in a robust, workable, and transparent manner
A.J Barton and Ongaha Farms Limited	S327	support	S327/012	The charging process needs to be discussed. The expense of consent change is onerous for the consent holder.	Rule R.R1] That while the onus for assessing the potential effects of new resource consents might justifiably lie with the applicant, the onus and costs for changing existing consents should lie with the Council, unless there are demonstrable adverse environmental effects which must be mitigated.
A.J Barton and Ongaha Farms Limited	S327	support	S327/016	Fits with our earlier submissions (S124/009,030,033,036,037 and 038) on Category A,B and C groundwater	[Rule R.R1] That the maps shown in Figures 7.8 & 7.9 of the NRP be removed. These are derived from regional scale mapping which ignores local variation in groundwater conditions. The maps are inaccurate. Presenting the maps in the NRP is misleading and will lead to pre-determination when considering resource consent applications;
Rangitane o Wairarapa Inc	S279	oppose	S279/019	Oppose the removal of this objective O8 a Community, collaborative set objective relating to allocation network.	Retain
Rangitane o Wairarapa Inc	S279	Oppose	S279/062	O52e Storage of water enhances the efficiency of water allocation.	Retain (e)
Rangitane o Wairarapa Inc	S279	Oppose	S279/074	Oppose the removal of this Policy P7 a Community, collaborative based policy on beneficial use.	Retain

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Rangitane o Wairarapa Inc	S279	Oppose	S279/142	Oppose amendment to this P111 a Community, collaborative based policy prioritising essential water use.	Retain
Rangitane o Wairarapa Inc	S279	Oppose	S279/145	Oppose removal of this P114 a Community, collaborative based policy prioritising essential water use.	Retain
Rangitane o Wairarapa Inc	S279	Oppose	S279/150	Oppose removal of this P120 Storage of water enhances the efficiency of water allocation and further beneficial use to the region.	Retain
Fish and Game	S308	Oppose	S308/046	Oppose removal of this P7 Oppose the removal of this Policy P7 a Community, collaborative based policy on beneficial use.	Retain
Fish and Game	S308	Oppose	S308/050	Oppose removal of this P11 Storage of water enhances the efficiency of water allocation and further beneficial use to the region	Retain

**If you require more space for additional comments, please insert new rows as needed**