

Proposed Natural Resources Plan:

Submitter:

Richard Osborne

Submitter Number:

S384

#1531020

5384

SUBMISSION on the proposed Natural Resources Plan for the Wellington Region

To: regionalplan@gw.govt.nz OR Freepost 3156, GWRC, PO Box 11646, Wellington 6142

23 OCT 2015

Name	Richard Osborne
Farm Name	JDQ Ltd
Physical Address	8 Backwater road RD3 Martonborough
Phone Number	0274527432
Email Address	

Communication from GWRC: I prefer email OR hardmail choose one

Trade competition: I could not gain an advantage in trade competition through the submission

Hearing: I wish to be heard and would consider jointly appearing with other submitters

Support: I support Wairarapa Federated Farmers submission

INTRODUCTION – Key Points about farm/business

Farm Type	e.g. Sheep, Beef, Arable, Dairy, agricultural business
Farm size (area)	380 hectares
Main Waterways	Kuonohanga
GW Soil plan or Farm Plan	Yes/No
Environmental investments	
QE2 or Retirement Blocks	
General Comments	e.g. if you like the partnership approach with council staff on the ground, say so

STOCK EXCLUSION

Specific Provisions that my submission relates to are:

Definition of Category Two waterbodies, including water races and drains > 1 metre

Schedule I and Map 22: important trout spawning habitat

Rule 97: access to the beds of surface waterbodies by livestock

- Stock exclusion from Category One waterbodies by July 2018
- Stock exclusion from Category Two waterbodies by July 2022
- Stock access to Category Three waterbodies – permitted subject to conditions, e.g. crossings

My submission is: ~~support~~/oppose

I seek the following changes:

Extend the timeframes, e.g. Category One by 2020, Category Two by 2025

Exclude sheep from Category One

Exclude water races and drains from Category Two

Delete requirement for dairy cow exclusion from hill country rivers > 1 metre

Specify that stock exclusion from spawning sites – inanga or trout – is during the spawning season.

Specify criteria for "important" trout spawning rivers; delete those that don't meet the criteria

Amend the definitions of stock crossing to match hill country practicalities and effects

Allow for stock drinking points

Ensure that alternative stock water supplies are available and rules don't apply until they are.

Stock Exclusion Comments and Reasons

Specific to your farm, e.g. discussion on costs, practicalities, stock water; attach/include photos
For Category One sites, would it be reasonable to exclude sheep where there is agreement between landowner, council and iwi as part of Council funded management plan?

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region
 This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991



To: Freepost 3156
 Wellington Regional Council
 PO Box 11646
 Wellington 6142

Or email: regionalplan@gw.govt.nz

Your details

Full name: Richard Osborne
 Organisation name: JJDQ Ltd
 (if applicable)
 Address for Service: 8 water road RD3 Martborough

Telephone no's: Work: 063069231 Home: _____ Cell: 0274527482

Contact person: Richard Osborne

Address and telephone no (if different from above): _____

Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We will send you updates on the process, information and provide you with details of any meetings and the hearing. Please tick here if you do not agree to receive communication via email.

Email address: _____

Trade competition

- I/we could not gain an advantage in trade competition through this submission. (Go straight to Your Submission)
- I/we could gain an advantage in trade competition through this submission. If you could gain an advantage please complete one of the following:
 - I/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.
 - I/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.

Your submission

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): <u>Whole Plan</u>	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	I support the submission of the Wairarapa Water Users Society Inc as a member of that organisation.
	I seek the following decision from WRC (give precise details): →	

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/section number):	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/section number):	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/section number):	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	

If you have more submissions you wish to make, please find more boxes at the bottom of this document

Attendance and wish to be heard at hearing(s)

- 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).]
- 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.]
- If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature:



Date:

19/10/15

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

#1530576

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region
This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991



To: Freepost 3156
Wellington Regional Council
PO Box 11646
Wellington 6142

21 OCT 2015 4:10 PM

Your details

Full name: Leo Vollebregt

Organisation name (if applicable): Wairarapa Water User's Inc. Society

Address for service: Leo Vollebregt
235 Pahautea Road, RD1,
Featherston

Telephone no's: Work: 063088405 Home: 063088405 Cell: 0272588405

Contact person: Leo Vollebregt

Address and telephone no (if different from above): _____

Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We will send you updates on the process, information and provide you with details of any meetings and the hearing. Please tick here if you do not agree to receive communication via email.

Email address: lvoll@xtra.co.nz

Trade competition

I/we could not gain an advantage in trade competition through this submission [If you ticked this box, delete the rest of this section and go straight to "Your submission"]

I/we could gain an advantage in trade competition through this submission

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

I/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.

I/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.

Your submission

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:
Please continue on separate sheet(s) - an excel spreadsheet of all of the proposed plan provisions is available online www.gw.govt.nz/regional-plan-review

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): 	My submission on this provision is →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	our submission is attached to this details form
	I seek the following decision from WRC (give precise details): →	

Attendance and wish to be heard at hearing(s)

- YES** I/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).]
- I/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.]
- If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature:



Date:

20/10/2015

[Person making submission or person authorised to sign
on behalf of person making submission. NB. Not required if making an
electronic submission]

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Wairarapa Water User's Inc. Society,
c/- Leo Vollebregt,
235 Pahautea Road,
RD1,
Featherston.
21st October 2015

Wellington Regional Council
Wellington

Dear Sir/Madam

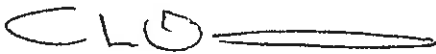
Please find enclosed our submission on the Proposed Natural Resources Plan for the Greater Wellington Region.

This replaces the interim submission we put in before the 25th of September.

Also enclosed are the submissions of 49 of our members some of whom have added extra comments.

Our society and it's members were granted an extension of the submission deadline to the 23rd of October 2015.

Yours sincerely



Leo Vollebregt

Chairman

List of submitters;

Wairarapa Water User's Inc. Society

Graeme Tulloch

Peter Vollebregt

Willy and Sally Bosch

Bernard George

Jim Hedley

Richard and Carolyn Stevenson

Andrew Patrick

Gary and Ann Daysh

A and A Webster	Chris Engel
Sandra Shivas	Andrew Harvey
Shane Gray	John Barton
George Ritchie	Mike Warren
Stephen Hammond	Mike Moran
Gerard Vollebregt	Simon Campbell
Bryan Tucker	Matt Honeysett
Rod Sutherland	David Holmes
Bob Tosswill	Mike Slater
Richard Kershaw	Ray Craig
Shaun Rose	Mark Guscott
Willem Stolte	Ed Handyside
Richard Osborne	Brad Gooding
Blair Roberts	Daniel George
Hayden Thurston	Neville Davies
Brian Bosch	Gary Svenson
Stewart Weatherstone	Ann Gray
Owen Butcher	Sandy Bidwill
Donald McCreary	Lewis Herrick
Leo and Rebecca Vollebregt	John Petrie
Kurt Simmonds	

Wairarapa Water User's Inc. Society

Submission on the

Proposed Natural Resources Plan

<u>Provision</u>	<u>Text</u>	<u>Support/ Oppose/ Amend</u>	<u>Reasons</u>	<u>Relief sought</u>
<u>Definitions</u>	<p>Groundwater directly connected to surface water at the locations generally shown in Figures 7.2, 7.5, 7.6, 7.7, 7.8 and 7.9 in chapter 7; Figures 8.1 and 8.2 in chapter 8; and Figure 10.1 and 10.2 in chapter 10. Taking water from Category A groundwater is considered to be surface water allocation.</p>	amend	<p>The categorisation of groundwater needs clarification in the definitions. The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt. Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses severely.</p>	<p>Ground water will be categorised A or B or C once GW has field verified its connectivity with surface water and performed an empirical calibration of the model</p>
<p>Category A groundwater</p> <p>Category B groundwater (directly connected)</p> <p>Category B groundwater (not directly connected)</p> <p>Category C groundwater</p>	<p>Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (directly connected) is at the locations generally described in Tables 7.3 and 7.4 in chapter 7, Table 8.2 chapter 8 and Table 10.2 in chapter 10. Taking water from category B groundwater (directly connected) is considered to be surface water allocation.</p>		<p>The definitions of Category A, B and C groundwater need to be robust, and a mechanism or process must be provided for identifying which Category aquifer a particular abstraction may be tapping. Since any conditions must be related to the 'effects', it would seem that Category A (i.e. direct connection) should be able to demonstrate a strong and consistent relationship between daily river levels and daily groundwater levels. If not then conditions linked to low flows will have no relevance. There should also be a clear and quantifiable difference between Category A & B. at present the 'management approach' appears to be the same even though the two aquifers are demonstrably different in their response to river levels.</p>	
	<p>Groundwater not classified as either category A groundwater or category C groundwater and which is defined as being not directly connected to surface water through applying the tests in Schedule Q (efficient use). Category B groundwater (not directly connected) is at the locations generally described in Table 7.5 in chapter 7, Table 8.3 in chapter 8 and Table 10.3 in chapter 10. Taking water from category B groundwater (not directly connected) is considered to be groundwater allocation.</p> <p>Groundwater not directly connected to surface water at the locations generally shown in Figures 7.2-7.9 in chapter 7,</p>		<p>In February 2015 work undertaken in the river bed by the Waihenga river level recorder interfered with readings so that consent holders unknowingly resumed taking water even though the river had reached minimum flow. Observers working by the river reported no adverse</p>	

	Figures 8.1-8.2 in chapter 8, and Figure 10.1 in chapter 10. Taking water from category C groundwater is considered to be groundwater allocation.		effects to this take at low flows indicating poor relation of the takes to the river.	
groundwater directly connected to surface water infrastructure*	<p>Category A groundwater and the component of Category B groundwater that is directly connected to surface water and part of the surface water allocation amount.</p> <ul style="list-style-type: none"> the local authority wastewater and stormwater networks, systems and wastewater treatment plants 	amend	There is no definition of what directly connected means.	Groundwater in the bore is at the same level as the water in the river and moves up and down with the level of the river
Inused water	Where more than 25% of the maximum daily amount of water allocated to a person for use on a property they own or have an interest in, but not including water that is transferred for use at another location by means of a transfer permit, is demonstrated to not be used over a period of two consecutive years.	support	Water race networks are vital community assets as are the many investments farmers and orchardists have made to use water	Add after treatment plants ... water race networks and facilities for the irrigation of pasture and crops
Objective O8	The social, economic, cultural and environmental benefits of taking and using water are recognised and provided for within the Plan's allocation framework.	amend	Objective does not give enough value to the use and potential use of water.	retain
Objective O25 (c)	<p>To safeguard aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area:</p> <p>(c) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is</p>	Oppose	Objective (c) aims to meet certain standards -this objective should not be giving guidance to the Whatua before current water quality levels are known	Remove

<p>able 3.6 groundwater irectly connected o surface water</p>	<p>improved over time to meet that objective.</p> <p>Nitrate concentrations do not cause unacceptable effects on groundwater-dependent ecosystems or on aquatic plants, invertebrate or fish communities in connected surface water bodies</p>	<p>amend</p>	<p>Unrealistic and non defined The actual numerical amount needs to be stated</p>	<p>nitrate in groundwater should not exceed human drinking water standards, i.e. 11.3</p>
<p>Objective O52</p>	<p>The efficiency of allocation and use of water is improved and maximised through time, including by means of:</p> <ul style="list-style-type: none"> (a) efficient infrastructure, and (b) good management practice, including irrigation, domestic municipal and industry practices, and (c) maximising reuse, recovery and recycling of water and contaminants, and (d) enabling water to be transferred between users, and (e) enabling water storage outside river beds. 	<p>amend</p>	<p>Increasing water allocation allows for growth. (a) to (e) are good means to the objective. There needs to be the possibility of storage in stream</p>	<p>the efficiency of allocation and use of water is improved and maximised the amount is increased through time, including by means of: (a) to (e) are good means to the objective. Add (f) <u>enabling storage within the bed of a river</u></p>
<p>Policy P6: Synchronised expiry and review dates</p>	<p>Resource consents may be granted with a common expiry or review date within a whatua or sub-catchment, if:</p> <ul style="list-style-type: none"> (a) the affected resource is fully allocated or over-allocated, or 	<p>Support/ amend</p>	<p>We support a good consistent and integrated approach i.e. in line with other consent periods in the region – 25 years Due to the significant investment in infrastructure a long consent is necessary.</p>	<p>Retain Add (c) <u>consents will run for a period of 25 years</u></p>

	<p>(b) the exercise of the resource consent may impede the ability to implement an integrated solution to manage water quality, quantity or habitat within that whatua or sub-catchment.</p>			
<p>Policy P7: Uses of and water (b) and (h)</p>	<p>(b) treatment, dilution and disposal of wastewater and stormwater, and</p> <p>(h) irrigation and stock water, and</p>	<p>Amend</p> <p>support</p>	<p>(b) recognises the use of water for diluting wastewater and stormwater. Diffuse contaminants need to be included.</p> <p>We are pleased to see irrigation get a special mention.</p> <p>retain</p>	<p>Add <u>diffuse contaminants to (b)</u></p> <p>retain</p>
<p>Policy P11: In-stream water storage</p>	<p>The benefits associated with the damming and storing of water within the bed of a river are recognised when:</p> <p>(c) there are significant social and economic benefits for the region, and</p> <p>(d) water remains available for multiple in-stream and out of stream uses concurrently, and</p> <p>(e) the reliability of water supply improves as a result, and</p> <p>(f) the damming and storage of water contributes to the</p>	<p>support</p>		<p>retain</p>

	efficient allocation and use of water.			
<p>Policy P107: Framework for taking and using water</p>	<p>The framework for the take and use of water recognises:</p> <p>(a) groundwater connectivity to surface water shall be managed as described in Schedule P (groundwater connectivity), and</p> <p>(b) the take and use of water does not exceed allocation amounts provided for in the Plan, and</p> <p>(c) minimum flows or water levels are managed in accordance with the Plan provisions.</p>	amend	<p>The connectivity between various ground water takes has not been verified and amongst the users there is significant doubt.</p> <p>Expecting users to individually verify as consents are renewed is expensive and potential use of water is restricted unnecessarily impacting on farm businesses and the district and regional economies severely and unnecessarily. An empirical calibration is necessary.</p>	<p>(a) <u>the groundwater connectivity described in schedule P needs verifying and GW have a significant part to play in establishing the evidence</u></p> <p><u>Insert (d) when schedule P changes: -ve effect on consent holders – 10 year lead in time to reflect cost, +ve effect - the water availability should be released immediately.</u></p>
<p>Policy P109: Lapse dates affecting water takes</p>	<p>Resource consents to take and use water shall be given effect to within three years of the commencement date unless a longer lapse date is justified due to the scale or complexity of the activity. For the purpose of this policy, "given effect to" includes the installation of infrastructure, water meter or flow measuring device or the use of the water in accordance with the purpose of the resource consent.</p>	support	<p>We support the use of water</p>	
<p>Policy P111: Water takes at minimum</p>	<p>The take and use of water shall not occur when flows or water levels fall below minimum flows or water levels in the whatiua chapters (chapters 7-</p>	Amend	<p>Policy 111 (water takes at minimum flows and water levels)(c) and 115 (authorising</p>	<p><u>Category A groundwater which shall be required to reduce take by 50% of the amount consented</u></p>

<p>flows and water levels</p> <p>(i)</p> <p>Policy P115: authorising takes below minimum flows and lake levels</p> <p>(d) and (c) i</p>	<p>11), with the exception that water is available below minimum flows:</p> <p>(c) as authorised by resource consents in accordance with Policy P108.</p> <p>(d) category A groundwater which shall be required to reduce the take by 50% of the amount consented above minimum flows, and</p> <p>(c) permanent horticultural or viticultural root crops (excluding pasture species, animal fodder crops and maize) for the sole purpose of avoiding their death provided:</p> <p>(i) the water shall only be available five days (120 hours) after minimum flow cessation take restrictions are imposed and where no practical alternative sources of water are available or accessible, and</p>	<p>takes below minimum flows and lake levels)(d) on restrictions should be changed to reflect the delayed interference with surface water and the likelihood of aquifer storage and infiltration rate at different distances from the surface water. A practical time lag should be allowed before take is reduced by 50%.</p> <p>As above</p> <p>The section 32 analysis for moving from a cease take position to 50% reduction in takes needs to be extrapolated to the effects of moving from no restrictions to 50% reduction in takes.</p> <p>Unrealistic to believe that only 5 days of additional water after minimum flows are reached will be enough to keep rootstock alive during prolonged low water levels</p>	<p>above minimum flows following a period of 10 days of continuous river levels at minimum flow</p> <p>As above</p> <p>Delete (c) (i)</p>
		<p>Amend</p> <p>oppose</p>	

<p>Policy P116: re-allocating water</p>	<p>Support</p>	<p>Water that becomes available from resource consents that are surrendered, lapsed, cancelled or not replaced, and by existing resource consents that are replaced for a lesser amount shall not be reallocated if the core allocation identified in Rules R.R1, WH.R1 and K.R1 in the whatua chapters of the Plan (chapters 7, 8 and 10) is exceeded.</p>	<p>Retain</p>
<p>Policy P117: Supplementary allocation amounts at flows above the median flow</p>	<p>support</p>	<p>In addition to core allocation, water is available from rivers at flows above the median flow provided flushing flows and a portion of flow above the median flow remains in the river to meet Objective O25.</p>	<p>retain</p>
<p>Policy P118: Reasonable and efficient use</p>	<p>amend</p>	<p>The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of: (a) applying the reasonable and efficient use criteria identified in Schedule Q (efficient use) to new users immediately, while existing users replacing existing resource consents have a period of four years from the date of the plan being made</p>	<p>The investment in infrastructure is considerable and time is required to implement changes (a) while existing users replacing existing resource consents have a period of 4 years from the date of the plan being made-operative renewal of consent to meet the criteria"</p>

	operative to meet the criteria, and			
Policy P119: unused water	<p>Unused water allocated to an existing resource consent may be re-allocated to the same user when the existing resource consent is replaced, or the abstraction rate is changed, only if the consent holder can demonstrate how the unused water will be used within four years, including by means of:</p> <ul style="list-style-type: none"> (a) a capital expenditure programme linked to the purpose water is used for, and (b) satisfying the reasonable and efficient use criteria identified in Schedule Q (efficient use). 	Support		Retain
Policy P120: taking water for storage	The taking of water for storage outside a river bed at flows above the median flow is appropriate provided Policy P117 is satisfied.	Support		Retain
Policy P128: transfer of resource consents	<p>The temporary or permanent transfer of the whole or part of the amount allocated by a resource consent(s) to take and use water shall be enabled, provided:</p> <ul style="list-style-type: none"> (a) the adverse effects of the take and use of transferred water are the same or less, and 	Support		retain

	<p>(b) the transfer occurs within the same catchment management unit, and</p> <p>(c) the same or a lesser amount of water is being taken or used, and</p> <p>(d) measuring and reporting the use of transferred water is no less than in the parent resource consent, and</p> <p>(e) the transferee's water take and use is reasonable and efficient for the intended use, including meeting the reasonable and efficient use criteria identified in Schedule Q (efficient use).</p>			
<p><u>Rules</u></p>				
<p>Rule R135: General rule for taking, use, damming and diverting water – discretionary activity</p>	<p>The damming or diverting of water that would otherwise contravene sections 14(2) or 14(3) of the Resource Management Act 1991 and is not permitted, controlled, restricted discretionary, discretionary, non-complying or a prohibited activity is a discretionary activity.</p>	<p>amend</p>	<p>The investment in infrastructure by users is significant and making this rule restricted discretionary gives consent holders more certainty at the time of consent renewal</p>	<p>Make this rule <u>restricted discretionary</u></p>
<p>Rule R137: Farm dairy washdown</p>	<p>The take and use of water from a surface water body (other than a water race that is permitted by Rule R138) or groundwater for the purpose of</p>	<p>amend</p>		

<p>id milk-cooling ater – permitted :ivity)</p>	<p>farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:</p> <p>(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.</p>		<p>(b) delete words after "...property." Leaving this in is anti growth and development and not in the best interests of the Wairarapa</p>	<p>(b) the total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015), and</p> <p>Note Water taken for farm dairy washdown and cooling water may be taken in addition to water taken under Rule R136.</p> <p>In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.</p>
<p>Rule R143: emporary water ermit transfers – ontrolled activity</p>	<p>The transfer of the whole or part of a water permit for the take and use of water to another location for a period of no more than one year is a controlled activity, provided the following conditions are met:</p>	<p>amend</p>	<p>Rule 143 (temporary water permit transfers) – for this rule to serve the objective in a usable and dynamic way transferring water permits needs to be a permitted activity not controlled</p>	<p>Delete Controlled and make this rule a <u>permitted</u> activity</p>
<p>Rule R144: ransferring water ermits – restricted iscretionary ctivity</p>	<p>The transfer of the whole or part of a water permit for the take and use of water that does not meet the conditions of Rule R143 or that is for a period of more than one year is a restricted discretionary activity, provided the following conditions are met:</p>	<p>support</p>		<p>retain</p>
<p><u>Other methods</u></p>				

<p>Method M13: Wairarapa water races</p>	<p>Wellington Regional Council will work with Wairarapa district councils and landowners to characterise the hydrology, water quality, ecology, and the social, heritage and cultural values of the Wairarapa water races to develop management options for the water race systems by 2017. The management options include, but are not limited to:</p>	<p>amend</p>	<p>The economic values of water races are very important to land owners who have them. They were put in place so that the surrounding land could be farmed.</p>	<p>In opening paragraph insert after cultural values and <u>economic values</u> of the Wairarapa water races...</p>
<p>Method M18: Water use groups</p>	<p>Wellington Regional Council will:</p> <ul style="list-style-type: none"> (a) support water user groups, or voluntary agreements between water users, to share takes and manage allocations, and (b) support water user groups to assist with water sharing during times of restrictions or when the catchment is fully allocated, and (c) provide, where available, accurate technical information to assist user groups. 	<p>Support</p>	<p>Method 18 (water user groups) will work well but transferring water needs to be a permitted activity.</p>	<p>retain</p>
<p>Method M19: Water management (d)</p>	<ul style="list-style-type: none"> (d) promoting alternatives to the use of water races, and 	<p>amend</p>	<p>Costs of change will be substantial for some landowners. Access to power and underground water as well as maintenance of fenced off races are issues.</p>	<p>Change wording of (d) to <u>quantify costs and benefits of water races and explore alternatives</u></p>
<p>Method M28: Development of good management practice guidelines.</p>	<p>Wellington Regional Council will continue to develop practices, procedures and tools (including rules) in collaboration with industry, other relevant organisations and stakeholders to support the</p>	<p>support</p>	<p>good method esp. the use of the words "collaboration with industry"</p>	<p>retain</p>

	implementation of policies which rely on good management practice to achieve desired environmental outcomes.		positive move which will have farmers moving forward in their practices with the reg. council??	
<u>tuamahanga</u> <u>Whaitua</u> Policy R.P3: Cumulative effects on river reaches of allocating water	When allocating river water or groundwater directly connected to surface water, regard shall be given to cumulative adverse effects on aquatic ecosystems in downstream river reaches as a result of flow depletion from loss of river water to groundwater.	amend	Important that the effects are measured, not just modelled.	Insert after - adverse effects – that are measured on aquatic ...
<u>Figures 7.3 – 7.8</u>	Water allocation amounts	Oppose	Again the categories need <u>empirical</u> verifying. Too big an impact and too little evidence of benefit to the environment to ignore. As a community we need to verify categories and as this occurs the amounts in these tables may change significantly	Do not include figures 7.3 – 7.8 in the plan until categories have been verified
<u>Tables 7.3 – 7.5</u>	Surface and groundwater allocation amounts	Oppose	The allocation amount should reflect the current consented allocation amount. Some of the allocation amounts are considerably lower than the allocation currently consented. Consideration of consent applications has confirmed the amounts of allocation that are sustainable. Setting an allocation limit which is inconsistent with consented and sustainable allocations creates an unrealistic community expectation of the level of abstraction which can occur from the water sources.	Change the allocation amounts to what is currently allocated or more if spare water has been identified

<p>Schedule R: guideline for stepdown allocations</p>	<p>When river flows are low, stepdown allocations may be included as conditions of resource consent when rivers approach minimum flows.</p> <p>Stepdown allocations may require a take to cease or be reduced. Taking water that is not for the health needs of people may be required to cease or be reduced as flows approach minimum river flows. Typically, the reduction in water take that may be required will be half the consented amount.</p> <p>Stepdown allocations for specific rivers are identified in Table R1 unless otherwise agreed by a water user group. In other rivers, stepdown allocations may be agreed by a water user group, or in the absence of agreement or such a group, may be implemented by the Wellington Regional Council.</p>	<p>Support with amendments</p>	<p>Schedule R – guideline for stepdown allocations – good schedule and good use of user groups</p> <p>However needs of stock drinking water and rootstock protection needs acknowledging</p> <p>However more and more appropriate management points e.g. further south of Waihenga are required. GW to establish in consultation with water users.</p> <p>As water is cleaned up the minimum flow requirement for dilution is lower.</p> <p>The effects of low flows needs to demonstrated as are the effects of restrictions</p> <p>There also needs to be room for the Whaitua to have their input</p>	<p>Add after health needs of people - <u>stock drinking water and rootstock protection</u></p> <p>Table R1 is interim GW to consult with water users</p>
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Table R1: Stepdown allocations for rivers in the Ruamāhanga River catchment

River	Minimum flow (L/sec)	Flow at which takes shall cease other than for the health needs of people or stock drinking water (water races) (L/sec)	Flow at which shall reduce (L/sec)	Management point
Waipoua River	250		300	Mikimiki Bridge
Waingawa River	1100	1700	1900	Kaituna
Parkvale Stream	100		120	Renalls Weir Recorder
Mangatarere Stream	[upper reach] 240		[upper reach] 330	Gorge Recorder
	[lower reach] 200		[lower reach] 240	Gorge Recorder
Waiohine River	2300	3040		Gorge Recorder
Upper Ruamāhanga River	2400		2700	Wardells
Tauherenikau River	1100	1300		Gorge Recorder
Lower Ruamāhanga River	8500		9200	Waihenga Recorder

We are concerned that the extent of section 32 reports in relation to water allocation do not identify the effects of proposed changes on our members in enough detail.