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Please enter your details below	
*Submitter Name: Full name, or Name of Organisation / Company	Fensaughty Partnership - Riu Huna Farm
Contact person for submission: (If different to above)	Jack Fenaughty
Telephone no: (Not required)	Insert
*Address for service: (Email, or physical address) Please note, an <u>email address</u> is the preferred method	jack.fenaughty@gmail.com
*I wish to be heard in support of my submission at a hearing	Yes
*I would consider presenting a joint case at the hearing with others who make a similar submission	Yes
*I could gain an advantage in trade competition through this submission	No
Only answer this question if you answered 'yes' to the above question. I am directly affected by an effect of the subject matter of the submission that: A) adversely affects the environment; and B) does not relate to trade competition or the effects of trade competition	Select A or B
In providing a submission to Greater Wellington, I agree to having read and understood the terms and procees outlined in this Information Statement	
If providing a submission on behalf of a company / organisation I confirm that I have authority to do so:	Signature
Date:	Insert
Please enter your feedback in the next worksheet " 2) Feedback on Provisions ". All of the provisions in the proposed change have been included so please place your comments in the correponding cells. If you have questions on how to use this submission form please vist our Submitter User Help Guide or email one of our friendly team at regionalplan@gw.govt.nz	

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	Decision Sought *
		Amended New Not applicable to Whaitua Not applicable to Te-Awarua-o- Porirua N/A	Support Oppose Neutral Amend Not stated	Freshwater Part 1 Schedule 1 Both	Please provide a summary of the reasons for your feedback on each provision to help us understand your position.	Please describe the actual changes to the provision that you would like to see and, where possible, include your suggested alternative wording. NOTE: Any deletions should be identified using strike through , and insertions should be identified using bold .
2 Interpretation	2.2 Definitions	Amended		Both		
	Afforestation	New	Select stance	Freshwater		
	Allocation amount	Amended	Select stance	Part 1 Schedule 1		
	Annual stocking rate	New	Select stance	Freshwater		
	Catchment management unit	Amended	Select stance	Part 1 Schedule 1		
	Coastal water management units	New	Select stance	Part 1 Schedule 1		
	Containment standard	New	Select stance	Part 1 Schedule 1		
	Core allocation	Amended	Select stance	Part 1 Schedule 1		
	Dry weather discharges	New	Select stance	Part 1 Schedule 1		
	Earthworks	New	Select stance	Part 1 Schedule 1		
	Effective hectares	New	Select stance	Freshwater		
	Environmental outcomes	New	Select stance	Part 1 Schedule 1		
	Erosion and sediment management plan	New	Select stance	Freshwater		
	Erosion risk treatment plan	New	Select stance	Freshwater		
	Existing wastewater discharge	New	Select stance	Part 1 Schedule 1		
	Harbour arm catchments	New	Select stance	Part 1 Schedule 1		
	Harvesting	New	Select stance	Freshwater		
	High risk industrial or trade premise	New	Select stance	Part 1 Schedule 1		
	Highest erosion risk land (plantation forestry)	New	Select stance	Freshwater		
	Highest erosion risk land (pasture)	New	Select stance	Freshwater		
	High erosion risk land (pasture)	New	Select stance	Freshwater		
	Highest erosion risk land (woody vegetation)	New	Select stance	Freshwater		
	Hydrological control	New	Select stance	Part 1 Schedule 1		
	Impervious surfaces	New	Select stance	Part 1 Schedule 1		
	Intensive grazing	New	Select stance	Freshwater		
	Limit	New	Select stance	Part 1 Schedule 1		
	Mechanical land preparation	New	Select stance	Freshwater		
	Nationally threatened freshwater species	New	Select stance	Part 1 Schedule 1		
	Nitrogen discharge risk	New	Select stance	Freshwater		
	Part Freshwater Management Unit	New	Select stance	Freshwater		
	Primary contact sites	New	Select stance	Freshwater		
	Recognised Nitrogen Risk Assessment Tool	New	Select stance	Freshwater		
	Redevelopment	New	Select stance	Part 1 Schedule 1		
	Registration	New	Select stance	Freshwater		
	Registered forestry adviser	New	Select stance	Freshwater		
	Replanting	New	Select stance	Freshwater		
	Sacrifice paddocks	New	Select stance	Freshwater		
	Small stream riparian programme	New	Select stance	Freshwater		
	Stabilisation	New	Select stance	Part 1 Schedule 1		
	Stormwater	Amended	Select stance	Part 1 Schedule 1		
	Stormwater catchment or sub-catchment	New	Select stance	Part 1 Schedule 1		
	Stormwater management strategy	New	Select stance	Part 1 Schedule 1		
	Stormwater network	Amended	Select stance	Part 1 Schedule 1		
	Stormwater treatment system	New	Select stance	Part 1 Schedule 1		
	Stocking rate	New	Select stance	Freshwater		
	Stock unit	New	Select stance	Freshwater		
	Unplanned greenfield development	New	Select stance	Part 1 Schedule 1		
	Vegetation clearance (for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20)	New	Select stance	Freshwater		
	Wastewater network catchment or sub-catchment	New	Select stance	Part 1 Schedule 1		
	Wet weather overflows	New	Select stance	Part 1 Schedule 1		
	Whaitua	Amended	Select stance	Part 1 Schedule 1		
	Winter Stocking rate	New	Select stance	Freshwater		
3 Objectives	Amendments to Chapter 3 - Objectives	Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O2	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O5	Not applicable to Whaitua	Select stance	Freshwater		
	Objective O6	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O17	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O20	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O34	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O35	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O36	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O37	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O38	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	3.6 Water quality	Amended/Not applicable to Whaitua		Part 1 Schedule 1		
	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.1 Primary contact recreation and Māori customary use objectives in freshwater bodies.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.2 Secondary contact and Māori customary use recreation objectives in freshwater bodies.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.3 Contact recreation and Māori customary use objectives in coastal water.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	3.7 Biodiversity, aquatic ecosystem health and mahinga kai	Amended/Not applicable to Whaitua		Part 1 Schedule 1		

	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and the coastal marine area are safeguarded.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.4 Rivers and Streams.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.5 Lakes.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.6 Groundwater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Table 3.7 Natural wetlands.	Amended	Select stance	Part 1 Schedule 1		
	Table 3.8 Coastal waters.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	3.8 Sites with significant values	Amended		Part 1 Schedule 1		
	Objective O25: Outstanding water bodies identified in Schedule A (outstanding water bodies) and their significant values are protected and restored.	Amended	Select stance	Part 1 Schedule 1		
	Objective O28: Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.	Amended	Select stance	Part 1 Schedule 1		
4 Policies		Not applicable to Whait / Not applicable to Whaitua Te Awarua-o-Porirua		Part 1 Schedule 1		
	Policy P65: National Policy Statement for Freshwater Management requirements for discharge consents.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P70: Minimising effects of rural land use activities.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P71: Managing the discharge of nutrients.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P72: Priority Catchments.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P73: Implementation of farm environment plans in priority catchments.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P74: Avoiding an increase in adverse effects of rural land use activities and associated diffuse discharges of contaminants.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P76: Consent duration for rural land use in priority catchments.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P77: Improving water quality for contact recreation and Māori customary use.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P79: Quality of point source discharges to rivers.	Not applicable to Whaitua	Select stance	Freshwater		
	Policy P82: Avoiding inappropriate discharges to water.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P83: Minimising adverse effects of stormwater discharges.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P84: Managing land use impacts on stormwater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P85: Development of a stormwater management strategy for first-stage local authority and state highway network consents.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P86: Second-stage local authority and state highway network consents.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P87: Minimising wastewater and stormwater interactions.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P88: Assessing resource consents to discharge stormwater containing wastewater.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Policy P118: Water takes at minimum flows and minimum water levels.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Policy P121: Core allocation for rivers.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	4.6 Biodiversity, aquatic ecosystem health and mahinga kai.	Amended		Part 1 Schedule 1		
	Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.	Amended	Select stance	Part 1 Schedule 1		
	Policy P36: Restoring Wairarapa Moana	Amended	Select stance	Part 1 Schedule 1		
	4.7.3 Sites with significant indigenous biodiversity value.	Amended		Part 1 Schedule 1		
	Policy P45: Protecting trout habitat.	Amended	Select stance	Part 1 Schedule 1		
	4.9.1 Discharges to land and water.	Amended		Part 1 Schedule 1		
	Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.	Amended	Select stance	Part 1 Schedule 1		
5.1 Air quality rules	5.1.2 Outdoor burning.	Amended		Part 1 Schedule 1		
	Rule R1: Outdoor burning – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R3: Outdoor burning for firefighter training – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.4 Large scale combustion activities.	Amended		Part 1 Schedule 1		
	Rule R7: Natural gas and liquefied petroleum gas – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R8: Diesel or kerosene blends – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R9: Biogas – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R10: Untreated wood – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R11: Coal, light fuel oil, and petroleum distillates of higher viscosity – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	Rule R12: Emergency power generators – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
	5.1.5 Chemical and metallurgical processes.	Amended		Part 1 Schedule 1		
	Rule R14: Spray coating within an enclosed space – permitted activity.	Amended	Select stance	Part 1 Schedule 1		

Rule R15: Spray coating not within an enclosed space – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R16: Printing processes – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R17: Dry cleaning – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R18: Fume cupboards – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R19: Workplace ventilation – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R20: Mechanical processing of metals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R21: Thermal metal spraying – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
5.1.7 Dust generating activities.	Amended		Part 1 Schedule 1		
Rule R25: Abrasive blasting within an enclosed booth – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R26: Abrasive blasting outside an enclosed area – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R27: Handling of bulk solid materials – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R28: Cement storage – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
5.1.8 Food, animal or plant matter manufacturing and processing.	Amended		Part 1 Schedule 1		
Rule R29: Alcoholic beverage production – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R30: Coffee roasting – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R31: Food, animal or plant matter manufacturing and processing – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
5.1.9 Fuel storage	Amended		Part 1 Schedule 1		
Rule R33: Petroleum storage or transfer facilities – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
5.1.10 Mobile sources.	Amended		Part 1 Schedule 1		
Rule R34: Mobile source emissions – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
5.1.11 Gas, water and wastewater processes.	Amended/New		Part 1 Schedule 1		
Rule R35: Water and wastewater processes – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R35A: Gas processes – permitted activity.	New	Select stance	Part 1 Schedule 1		
5.1.12 Drying and kiln processes.	Amended		Part 1 Schedule 1		
Rule R36: Drying and heating of minerals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
5.1.13 Discharge of agrichemicals.	Amended		Part 1 Schedule 1		
General conditions for the discharge of agrichemicals.	Amended	Select stance	Part 1 Schedule 1		
Rule R37: Handheld discharge of agrichemicals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R38: Motorised and aerial discharge of agrichemicals – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
Rule R39: Agrichemicals not permitted – restricted discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
5.1.14 Fumigation.	Amended		Part 1 Schedule 1		
Rule R40: Fumigation – permitted activity.	Amended	Select stance	Part 1 Schedule 1		
5.1.15 All other discharges	Amended		Part 1 Schedule 1		
Rule R42: All other discharges – discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
5.2 and 5.3 Discharges to land and water and land use rules	Not applicable to Whaitua		Part 1 Schedule 1		
Rule R48: Stormwater from an individual property – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R49: Stormwater from new subdivision and development – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R50: Stormwater from new subdivision and development – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R51: Stormwater to land – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R52: Stormwater from a local authority or state highway network – controlled activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R53: Stormwater from a local authority or state highway network with a stormwater management strategy – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R54: Stormwater from a port or airport – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R55: All other stormwater – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R56: Water races – discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
Rule R57: Existing pumped drainage schemes – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R58: All other pumped drainage schemes – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R65: Wastewater discharges to coastal and fresh water – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R66: Discharges of wastewater to fresh water – non-complying activity.	Not applicable to Whaitua	Select stance	Freshwater		
Rule R68: Discharge of treated wastewater from a wastewater network – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R101: Earthworks – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
Rule R102: Construction of a new farm track – permitted activity.	Not applicable to Whaitua	Select stance	Freshwater		
Rule R103: Construction of a new farm track – controlled activity.	Not applicable to Whaitua	Select stance	Freshwater		
Rule R104: Vegetation clearance on erosion prone land – permitted activity.	Not applicable to Whaitua	Select stance	Freshwater		
Rule R105: Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		

	Rule R106: Earthworks and vegetation clearance for renewable energy generation – restricted discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R107: Earthworks and vegetation clearance – discretionary activity.	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Rule R110: Use of rural land in priority catchments – permitted activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R111: Use of rural land in priority catchments – controlled activity.	Not applicable to Whaitua	Select stance	Freshwater		
	Rule R112: Use of rural land in priority catchments – discretionary activity.	Not applicable to Whaitua	Select stance	Freshwater		
	5.4.4 Uses of beds of lakes and rivers general conditions.	Amended		Part 1 Schedule 1		
	Beds of lakes and rivers general conditions.	Amended	Select stance	Part 1 Schedule 1		
	5.4.5 Uses of beds of lakes and rivers.	Amended		Freshwater		
	Rule R128: New structures – permitted activity.	Amended	Select stance	Freshwater		
	Rule R132: Minor sand and gravel extraction – permitted activity.	Amended	Select stance	Freshwater		
	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance – discretionary activity.	Amended	Select stance	Freshwater		
	5.4.7 All other uses of the beds of lakes and rivers.	Amended		Part 1 Schedule 1		
	Rule R145: All other uses of river and lake beds – discretionary activity.	Amended	Select stance	Part 1 Schedule 1		
	5.4.8 Damming and diverting water	New		Freshwater		
	Rule R151A: Ongoing diversion of a river – permitted activity.	New	Select stance	Freshwater		
	5.5 Water allocation rules	Not applicable to Te Awarua-o-Porirua Whaitua		Freshwater		
	Rule R152: Take and use of water – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R153: Farm dairy washdown and milk-cooling water – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R154: Water races – permitted activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R157: Take and use of water – controlled activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
	Rule R158: All other take and use – discretionary activity.	Not applicable to Te Awarua-o-Porirua Whaitua	Select stance	Freshwater		
6 Other methods	6.16 Freshwater Action Plan programme	New		Freshwater		
	Method M36: Freshwater Action Plan programme.	New	Select stance	Freshwater		
	Method M37: Freshwater Action Plan for the Parangarahu Lakes.	New	Select stance	Freshwater		
	Method M38: Freshwater Action Plan for the Rangituhi catchment.	New	Select stance	Freshwater		
	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Part 1 Schedule 1		
	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	6.17 Small farm property registration	New		Freshwater		
	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	6.16 Supporting improved water quality outcomes.	New		Part 1 Schedule 1		
	Method M43: Supporting the health of urban waterbodies.	New	Select stance	Part 1 Schedule 1		
	Method M44: Supporting the health of rural waterbodies.	New	Amend	Part 1 Schedule 1	<i>We are pleased to see that a range of financial support options for land retirement are proposed, including rates relief. We would like to see this also include compensation if large-scale land retirement progresses. We are also pleased to see the farm-scale approach promoted here and ask that it is better integrated into PC1's sediment and erosion control policies and rules. The lack of local water quality monitoring data means GWRC has had to make</i>	GWRC to prioritise this work on financial options prior to implementing new rules. Include increased GWRC support for additional water quality monitoring activities in Mākara and Ohariu, including community-led monitoring.
	Method M45: Funding of wastewater and stormwater network upgrades	New	Select stance	Part 1 Schedule 1		
8 Whaitua Te Whanganui-a-T	8.1 Objectives	New		Both		

	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	New	Select stance	Part 1 Schedule 1		
	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	New	Select stance	Freshwater		
	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	New	Select stance	Part 1 Schedule 1		
	Table 8.1 Coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	New	Select stance	Part 1 Schedule 1		
	Objective WH.O5: By 2040 the health and wellbeing of the Parangarau Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	New	Select stance	Freshwater		
	Table 8.2 Target attribute states for lakes.	New	Select stance	Freshwater		
	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	New	Select stance	Freshwater		
	Objective WH.O7: The physical integrity of aquitards is protected so that confined aquifer pressures are maintained.	New	Select stance	Freshwater		
	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pākura River, Akatarawa River and Wainuiomata River are suitable for primary contact.	New	Select stance	Freshwater		
	Table 8.3 Primary contact site objectives in rivers.	New	Select stance	Freshwater		
	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	New	Select stance	Freshwater		
	Table 8.4: Target attribute states for rivers.	New	Select stance	Freshwater		
	8.2 Policies	New		Both		
	Policy WH.P1: Improvement of aquatic ecosystem health.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P2: Management of activities to achieve target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Select stance	Freshwater		
	Policy WH.P4: Achievement of the visual clarity target attribute states.	New	Select stance	Freshwater		
	Table 8.5: Sediment load reductions required to achieve the visual clarity target attribute states.	New	Select stance	Freshwater		
	Policy WH.P5: Localised adverse effects of point source discharge.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P6: Cumulative adverse effects of point source discharges.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P7: Discharges to groundwater.	New	Select stance	Freshwater		
	Policy WH.P8: Avoiding discharges of specific products and waste.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P10: Managing adverse effects of stormwater discharges.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P11: Discharges of contaminants in stormwater from high risk industrial or trade premises.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P12: Managing stormwater from a port or airport.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P14: Stormwater discharges from new and redeveloped impervious surfaces.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P18: Progressing works to meet Escherichia coli target attribute states.	New	Select stance	Freshwater		
	Policy WH.P19: Managing wastewater network catchment discharges.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P20: Managing existing wastewater treatment plant discharges.	New	Select stance	Part 1 Schedule 1		
	8.2.4 Rural land use and earthworks	New		Both		

	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Amend	Freshwater	<i>The source of high e-coli levels in Mākara Stream is unknown and there are several potential sources (livestock, septic tanks, waterfowl). The sources need to be known for each catchment in order for them to be addressed. Some parts of the wider Mākara Stream catchment, and many streams outside the catchment, will likely not have an e-coli issue. Lack of consistency with WH.P22 (nitrogen) and WH.P23 (sediment). Work to reduce E-coli levels should only target areas</i>	Add "Identification of sources of e-coli specific to individual catchments". Add "Incorporate e-coli reduction in catchment context and farm plans, based on monitored data" – to allow a farm-scale approach as per nitrogen and sediment.
	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	New	Select stance	Freshwater		
	Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	New	Amend	Freshwater	<i>a). The PC1 mapping does not correspond well with ground-truthed information on erosion from landowners who have worked with the land for multiple generations. Concerned about both the accuracy of the modelled scenarios and that it might not include accurate analysis of soil types. We question the accuracy of the modelled scenarios which are going to be used with potentially devastating effects on landowners. the sources of</i>	a.) Identify sediment sources by using a farm-scale assessment of sediment sources rather than the erosion-risk mapping in PC1. Refocus this section on identifying "sediment sources" rather than erosion risk land/pasture. b.) Refocus from "erosion risk" to "sediment management. c). Remove this blanket approach to revegetation and instead rely on the bespoke actions and timeframes that will be identified through farm-scale assessment, including via the audited Freshwater Farm Plans.
	Policy WH.P24: Phasing of farm environment plans.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P25: Managing rural land use change.	New	Select stance	Freshwater		
	Policy WH.P26: Managing livestock access to small rivers.	New	Amend	Freshwater	<i>Make consistent with the associated Rule regarding reduced access rather than restricted access. We support revegetating streams but are limited by the number of small streams in our extremely hilly landscape, and therefore the high cost and the practicality of fencing some of these areas, especially in areas with consecutive gullies or in areas that are flood zones. Farm-scale analysis of risk and solutions is critical – rather than these blanket</i>	Replace "restrict" with "reduce". Amend the policy wording to match the heading about river size.

	Policy WH.P27: Promoting stream shading.	New	Support	Freshwater	<i>a.) At Riu Huna to date 0.51 ha has been fenced in riparian strips around the main small creek and several seeps, planted in combination of native and exotic trees and shrubs and fenced off currently using 1 km of fencing on the parameters. We have had no support to do this from any agency including GWRC. b.) We do not want to be doubling up on farm plan work in this respect when an existing process is already in play under national regulation.</i>	a). We recognise the value of riparian plantings of all usable types for shade and stabilisation and have invested a lot of our own time and money into this on Riu Huna with no external support from any agency. Our commitment to this indicates support for the measure. b.) Ensure that the details of this rule are consistent with the content and timing for Freshwater Farm Plans
	Policy WH.P28: Achieving reductions in sediment discharges from plantation forestry.	New	Select stance	Freshwater		
	Policy WH.P29: Management of earthworks.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P30: Discharge standard for earthworks.	New	Select stance	Part 1 Schedule 1		
	Policy WH.P31: Winter shut down of earthworks.	New	Select stance	Part 1 Schedule 1		
	8.2.5 Water allocation	New		Freshwater		
	Policy WH.P32: Minimum flows and minimum water levels in Whaitua Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Policy WH.P33: Core allocation in Whaitua Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	8.3 Rules	New		Both		
	8.3.1 Discharges of contaminants	New		Part 1 Schedule 1		
	Rule WH.R1: Point source discharges of specific contaminants – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	8.3.2 Stormwater	New		Both		
	Rule WH.R2: Stormwater to land – permitted activity.	New	Select stance	Freshwater		
	Rule WH.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R9: Stormwater from a local authority or state highway network–restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R10: Stormwater from new state highways– discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R12: All other stormwater discharges – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	8.3.3 Wastewater	New		Part 1 Schedule 1		
	Rule WH.R14: Wastewater network catchment discharges – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R15: Existing wastewater discharges from a treatment plant – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R16: All other discharges of wastewater – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	8.3.4 Land uses	New		Freshwater		
	Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity.	New	Select stance	Freshwater		
	Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity.	New	Select stance	Freshwater		
	Rule WH.R19: Vegetation clearance – discretionary activity.	New	Select stance	Freshwater		
	Rule WH.R20: Plantation forestry – controlled activity.	New	Select stance	Freshwater		
	Rule WH.R21: Plantation forestry – discretionary activity.	New	Select stance	Freshwater		
	Rule WH.R22: Plantation forestry on highest erosion risk land – prohibited activity.	New	Select stance	Freshwater		
	8.3.5 Earthworks	New		Both		

	Rule WH.R23: Earthworks – permitted activity.	New	Select stance	Freshwater		
	Rule WH.R24: Earthworks – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule WH.R25: Earthworks – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	8.3.6 Nutrients and sediment from pastoral farming	New		Freshwater		
	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares – permitted activity.	New	Select stance	Freshwater		
	Rule WH.R27: Farming activities on 20 hectares or more of land – permitted activity.	New	Select stance	Freshwater		
	Table 8.6: Phase-in of farm environment plans for part Freshwater Management Units.	New	Select stance	Freshwater		
	Rule WH.R28: Livestock access to a small river – permitted activity.	New	Oppose	Freshwater	<i>Farm-scale analysis of risk and solutions is critical – rather than blanket restrictions. There is a risk to increased animal welfare issues if livestock do not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks. A farm-scale approach needs to be supported to help deliver solutions such as sediment retention / stockwater ponds.</i>	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.
	Rule WH.R29: Livestock access to a small river – discretionary activity.	New	Oppose	Freshwater	<i>Farm-scale analysis of risk and solutions is critical – rather than blanket restrictions. There is a risk to increased animal welfare issues if livestock do not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks. A farm-scale approach needs to be supported to help deliver solutions such as sediment retention / stockwater ponds.</i>	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.
	Rule WH.R30: The use of land for farming activities – discretionary activity.	New	Select stance	Freshwater		
	Rule WH.R31: Change of rural land use – discretionary activity.	New	Select stance	Freshwater		
	Rule WH.R32: Farming activities – non-complying activity.	New	Select stance	Freshwater		
	8.3.7 Take and use of water	New		Freshwater		
	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara – restricted discretionary activity.	New	Select stance	Freshwater		
	Rule WH.R34: Take and use of water in the Whaitua Te Whanganui-a-Tara – discretionary activity.	Amended	Select stance	Freshwater		
	Rule WH.R35: Take and use of water from outstanding rivers or lakes – non-complying activity.	Amended	Select stance	Freshwater		
	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation – prohibited activity.	Amended	Select stance	Freshwater		
	Table 8.7: Minimum flows for rivers in the Whaitua Te Whanganui-a-Tara.	Amended	Select stance	Freshwater		
	Table 8.8: Surface water allocation amounts for rivers and Category A groundwater and Category B groundwater in the Te Awa Kairangi/Hutt River, Wainuiomata River and Ōrongorongo River catchments.	Amended	Select stance	Freshwater		
	Table 8.9: Groundwater allocation amounts for Category B groundwater and Category C groundwater in the Whaitua Te Whanganui-a-Tara.	Amended	Select stance	Freshwater		
	Figure 8.1: Te Awa Kairangi / Hutt River and Upper Hutt groundwater in Tables 8.8 and 8.9.	Amended	Select stance	Freshwater		
	Figure 8.2: Te Awa Kairangi / Hutt River and Lower Hutt groundwater in Tables 8.8 and 8.9.	Amended	Select stance	Freshwater		

Chapter 9 Te Awarua-o-Porirua Whaitua	9.1 Objectives	New		Both		
	Objective P.O1: The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.	New	Select stance	Part 1 Schedule 1		
	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural wetlands, and their margins are on a trajectory of measurable improvement towards wai ora.	New	Select stance	Freshwater		
	Objective P.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Pūatahanui Inlet, Onepoto Arm and the open coastal areas of Te Awarua-o-Porirua is maintained or improved to achieve the coastal water objectives set out in Table 9.1.	New	Select stance	Part 1 Schedule 1		
	Table 9.1: Coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Objective P.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased, and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	New	Select stance	Part 1 Schedule 1		
	Objective P.O5: Groundwater flows and levels, and water quality, are maintained.	New	Select stance	Freshwater		
	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	New	Select stance	Freshwater		
	Table 9.2: Target attribute states for rivers.	New	Select stance	Freshwater		
	9.2 Policies	New		Both		
	9.2.1 Ecosystem health and water quality	New		Both		
	Policy P.P1: Improvement of aquatic ecosystem health.	New	Select stance	Part 1 Schedule 1		
	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	New	Select stance	Freshwater		
	Policy P.P4: Contaminant load reductions.	New	Select stance	Part 1 Schedule 1		
	Table 9.3: Harbour arm catchment contaminant load reductions.	New	Select stance	Part 1 Schedule 1		
	Table 9.4: Part Freshwater Management Unit sediment load reductions required to achieve the visual clarity target attribute state.	New	Select stance	Part 1 Schedule 1		
	8.2.1 Discharges to water	New		Both		
	Policy P.P5: Localised adverse effects of point source discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P6: Point source discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P7 Discharges to groundwater.	New	Select stance	Freshwater		
	Policy P.P8 Avoiding discharges of specific products and waste.	New	Select stance	Part 1 Schedule 1		
	9.2.2 Stormwater	New		Part 1 Schedule 1		
	Policy P.P9: General stormwater policy to achieve the target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy P.P10: Managing adverse effects of stormwater discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or trade premises.	New	Select stance	Part 1 Schedule 1		
	Policy P.P12: Managing stormwater network discharges through a Stormwater Management Strategy.	New	Select stance	Part 1 Schedule 1		
	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	New	Select stance	Part 1 Schedule 1		
	Policy P.P14: Stormwater contaminant offsetting for new greenfield development.	New	Select stance	Part 1 Schedule 1		
	Policy P.P15: Stormwater discharges from new unplanned greenfield development.	New	Select stance	Part 1 Schedule 1		
	9.2.3 Wastewater	New		Both		
	Policy P.P16: General wastewater policy to achieve target attribute states and coastal water objectives.	New	Select stance	Part 1 Schedule 1		
	Policy P.P17: Progressing works to meet Escherichia coli target attribute states.	New	Select stance	Freshwater		
	Policy P.P18: Managing wastewater network catchment discharges.	New	Select stance	Part 1 Schedule 1		
	Policy P.P19: Managing existing wastewater treatment plant discharges.	New	Select stance	Part 1 Schedule 1		
	9.2.4 Rural Land Uses and Earthworks	New		Both		
	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Select stance	Freshwater		
	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	New	Select stance	Freshwater		
	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	New	Select stance	Freshwater		
	Policy P.P23: Phasing of farm environment plans.	New	Select stance	Freshwater		
	Policy P.P24: Managing rural land use change.	New	Select stance	Freshwater		
	Policy P.P25: Promoting stream shading.	New	Select stance	Freshwater		
	Policy P.P26: Achieving reductions in sediment discharges from plantation forestry.	New	Select stance	Freshwater		
	Policy P.P27: Management of earthworks sites.	New	Select stance	Part 1 Schedule 1		

	Policy P.P28: Discharge standard for earthworks sites.	New	Select stance	Part 1 Schedule 1		
	Policy P.P29: Winter shut down of earthworks.	New	Select stance	Part 1 Schedule 1		
	9.2.5 Water allocation	Amended/New		Freshwater		
	Policy P.P30: Minimum flows and minimum water levels in Te Awarua-o-Porirua Whaitua.	Amended	Select stance	Freshwater		
	Policy P.P31: Water takes at minimum flows and minimum water levels.	New	Select stance	Freshwater		
	Policy P.P32: Allocation in the Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	9.3 Rules	New		Both		
	9.3.1 Discharges of contaminants	New		Both		
	Rule P.R1: Point source discharges of specific contaminants – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R2: Stormwater to land – permitted activity.	New	Select stance	Freshwater		
	Rule P.R3: Stormwater from an existing individual property to surface water or coastal water – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R6: Stormwater from new greenfield impervious surfaces – controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas– controlled activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R8: Stormwater from a local authority or state highway network–restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R9: Stormwater from new state highways– discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R10: Stormwater from new and redeveloped impervious surfaces– discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R11: All other stormwater discharges – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R12 – Stormwater discharges from new unplanned greenfield development – prohibited activity.	New	Select stance	Part 1 Schedule 1		
	9.3.3 Wastewater	New		Part 1 Schedule 1		
	Rule P.R13: Wastewater network catchment discharges to water – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R14: Existing wastewater discharges from a treatment plant to coastal and freshwater – discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R15: All other discharges of wastewater – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	9.3.4 Land uses	New		Freshwater		
	Rule P.R16: Vegetation clearance on highest erosion risk land– permitted activity.	New	Select stance	Freshwater		
	Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity.	New	Select stance	Freshwater		
	Rule P.R18: Vegetation clearance – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R19: Plantation forestry – controlled activity.	New	Select stance	Freshwater		
	Rule P.R20: Plantation forestry – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R21: Plantation Forestry on highest erosion risk land – prohibited activity.	New	Select stance	Freshwater		
	9.3.5 Earthworks	New		Both		
	Rule P.R22: Earthworks – permitted activity.	New	Select stance	Freshwater		
	Rule P.R23: Earthworks – restricted discretionary activity.	New	Select stance	Part 1 Schedule 1		
	Rule P.R24: Earthworks – non-complying activity.	New	Select stance	Part 1 Schedule 1		
	9.3.6 Nutrients and sediment from pastoral farming	New		Freshwater		
	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares – permitted activity.	New	Select stance	Freshwater		
	Rule P.R26: Farming activities on 20 hectares or more of land – permitted activity.	New	Select stance	Freshwater		
	Table 9.5: Phase in of farm environment plans for Part Freshwater Management Units.	New	Select stance	Freshwater		
	Rule P.R27: The use of land for farming activities – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R28: Change of rural land use – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R29: Farming activities – non-complying activity.	New	Select stance	Freshwater		
	9.3.7 Take and use of water	New		Freshwater		
	Rule P.R30: Take and use of water – permitted activity.	New	Select stance	Freshwater		
	Rule P.R31: Take and use of water – restricted discretionary activity.	New	Select stance	Freshwater		
	Rule P.R32: Take and use of water – discretionary activity.	New	Select stance	Freshwater		
	Rule P.R33: Taking and use of water that exceeds minimum flows or allocation amounts – prohibited activity.	New	Select stance	Freshwater		
	Table 9.6: Minimum flows for Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		

	Table 9.7: Surface water allocation amounts for Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
12 Schedules		Amended/New		Both		
	Schedule A: Outstanding water bodies	New	Select stance	Part 1 Schedule 1		
	Schedule A2: Lakes with outstanding indigenous ecosystem values.	New	Select stance	Part 1 Schedule 1		
	Schedule F: Ecosystems and habitats with significant indigenous biodiversity values.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F2a: Significant habitats for indigenous birds in rivers.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F2b: Significant habitats for indigenous birds in lakes.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F2c: Significant habitats for indigenous birds in the coastal marine area.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F4: Sites with significant indigenous biodiversity values in the coastal marine area.	Amended	Select stance	Part 1 Schedule 1		
	Schedule F5: Habitats with significant indigenous biodiversity values in the coastal marine area.	Amended	Select stance	Part 1 Schedule 1		
	Schedule 27: Freshwater Action Plan requirements.	New	Select stance	Part 1 Schedule 1		
	A Freshwater Action Plans	New	Select stance	Freshwater		
	A1 Purpose	New	Select stance	Freshwater		
	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	A3 Freshwater Action Plans required in Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	B Freshwater Action Plan requirements.	New	Select stance	Freshwater		
	B1. Principles.	New	Select stance	Freshwater		
	B2. General Content.	New	Select stance	Freshwater		
	B3 Necessary actions.	New	Select stance	Freshwater		
	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	New	Select stance	Freshwater		
	D Freshwater Action Plans in Te Awarua-o-Porirua Whaitua	New	Select stance	Freshwater		
	Schedule 28: Stormwater Contaminant Treatment.	New	Select stance	Part 1 Schedule 1		
	Table 1: Target load Reductions for Copper and Zinc	New	Select stance	Part 1 Schedule 1		
	Table 2: Additional Devices and Specified Load Reductions for Copper and Zinc	New	Select stance	Part 1 Schedule 1		
	Schedule 29: Stormwater Impact Assessments.	New	Select stance	Part 1 Schedule 1		
	Schedule 30: Financial Contributions.	New	Select stance	Part 1 Schedule 1		
	A Context	New	Select stance	Part 1 Schedule 1		
	B Purpose	New	Select stance	Part 1 Schedule 1		
	C Definition of an Equivalent Household Unit	New	Select stance	Part 1 Schedule 1		
	D Calculation of level of contribution	New	Select stance	Part 1 Schedule 1		
	Table D1. Financial contribution calculations for residential greenfield development	New	Select stance	Part 1 Schedule 1		
	Table D2. Financial contribution calculations for non-residential greenfield development and new roads/state highways	New	Select stance	Part 1 Schedule 1		
	E Use	New	Select stance	Part 1 Schedule 1		
	Schedule 31: Stormwater Management Strategy – Te Whanganui-a-Tara and Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Schedule 32: Wastewater Network Catchment Improvement Strategy.	New	Select stance	Part 1 Schedule 1		
	Schedule 33: Vegetation Clearance Erosion and Sediment Management Plan.	New	Select stance	Freshwater		
	A Purposes of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	B Management objectives	New	Select stance	Freshwater		
	C Requirements of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	C1 Contents of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	D Amendment of Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	Schedule 34: Plantation Forestry Erosion and Sediment Management Plan.	New	Select stance	Freshwater		
	A Purpose of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	B Management objectives	New	Select stance	Freshwater		
	C Requirements of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	C1 Contents of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	C2 Certification of the Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	D Amendment of Erosion and Sediment Management Plan	New	Select stance	Freshwater		
	Schedule 35: Small farm registration.	New	Select stance	Freshwater		
	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	New	Select stance	Freshwater		
	A Certification requirements under the Resource Management (Freshwater Farm Plans) Regulations 2023.	New	Select stance	Freshwater		
	B Management objectives.	New	Select stance	Freshwater		
	C Content of a farm environment plan.	New	Select stance	Freshwater		
	D Risk assessment and mitigation to address risk.	New	Select stance	Freshwater		
	Table D1 Sediment loss and transport risk factors	New	Select stance	Freshwater		
	E Erosion Risk Treatment Plan.	New	Select stance	Freshwater		
	F Small stream riparian programme.	New	Select stance	Freshwater		
13 Maps		New		Both		

	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 1: (Kāpiti).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: (Wellington Harbour).	New	Select stance	Part 1 Schedule 1		
	Map 27: Sites with significant indigenous biodiversity values in the coastal marine area (Schedule F4) Insert 2: Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 77: Habitats of nationally threatened freshwater species – Te Awarua-o-Porirua and Te Whanganui-a-Tara (Schedule F1).	New	Select stance	Part 1 Schedule 1		
	Map 78: Part freshwater management units and target attribute state sites (rivers) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 79: Part freshwater management units and target attribute state sites (rivers) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 80: Part freshwater management units and target attribute state sites (lakes) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 81: Rivers and catchment management units for water takes – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 82: Coastal water management units – Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 83: Coastal water management units – Te Whanganui-a-Tara.	New	Select stance	Part 1 Schedule 1		
	Map 84: Harbour arm catchments – Te Awarua-o-Porirua.	New	Select stance	Part 1 Schedule 1		
	Map 85: Primary contact sites – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 86: Unplanned greenfield areas – Porirua City Council.	New	Select stance	Part 1 Schedule 1		
	Map 87: Unplanned greenfield areas – Wellington City Council.	New	Select stance	Part 1 Schedule 1		
	Map 88: Unplanned greenfield areas – Upper Hutt City Council.	New	Select stance	Part 1 Schedule 1		
	Map 89: Unplanned greenfield areas – Hutt City Council.	New	Select stance	Part 1 Schedule 1		
	Map 90: Highest and high erosion risk land (Pasture) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 91: Highest erosion risk land (Woody vegetation) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 92: Highest erosion risk land (Plantation forestry) – Te Awarua-o-Porirua.	New	Select stance	Freshwater		
	Map 93: Highest and high erosion risk land (Pasture) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 94: Highest erosion risk land (Woody vegetation/clearance) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 95: Highest erosion risk land (Plantation forestry) – Te Whanganui-a-Tara.	New	Select stance	Freshwater		
	Map 96: Mākara catchment.	New	Select stance	Freshwater		
	Map 97: Mangaroa catchment.	New	Select stance	Freshwater		

Fenaughty Partnership/ Riu Huna Farm submission on NRP Plan Change 1. J. B. and J M. Fenaughty

Summary

- We ask GWRC to take an approach which is not based on blanket rules, modelled scenarios and enforcement but on partnering and consulting with the community - some of us have been on this land for over half a century. We believe this approach would be more respectful of the community, acknowledges and uses local knowledge and experience and can deliver the same water quality outcomes.
- We strongly object to the lack of any direct consultation, including any contact with us as landholders (kaitiaki), no formal engagement through the community board and the completely unrealistic timeframe of less than 20 days for these submissions and for us to gain more complete understanding of these very extensive and significant planned changes.
- We question the apparent focus on sedimentation and erosion given the data are only available from one single monitoring station for our extremely large catchments and the additional use of broad-brush modelling without ground truthing to identify potential erosion sources. Additionally, we note that current monitoring data used to determine the levels and sources of e-coli across the multiple catchments is solely based on extrapolation from data from this single monitoring site which covers the complete Mākara and Ohariu catchments, noting strong differences in both these catchments and their sub-catchments. At the least, there needs to be more fine scale and regular water quality studies and potentially monitoring at the scale of each farm. We also note the effects of recent climate events such as the major flood in 2021, ongoing remedial Road works carried out through the Takarau Gorge over the last several years including work in the stream itself, increased housing activity particularly in Ohariu, and increased rainfall potentially because of the Tongan volcanic eruption during 2022.
- As the new national regulations have yet to be timetabled in this area, we submit that the transition time should be based on the actual timeframes for when new freshwater regulations come into effect from central government - not in advance, which appears to be the case. It is unclear why GWRC is acting prematurely and duplicating that process in our area with obvious cost both to landowners and themselves and reducing the available time for informed understanding of the potential problems we are trying to solve.
- We submit, noting again our view that the perceived problems are not clearly supported or articulated, that solutions are best achieved bespoke on-farm and by individual property solutions rather than the wider proposed approach which is based on the current whaitua or “Freshwater Management Unit”. Many of these small streams (less than 1 m wide) cross property boundaries (in our case the same small stream passes through four properties before entering the Makara stream) which must require a better approach to any implementation and monitoring.
- The cost of implementing the proposed changes on our farm assuming the requirement for a farm plan and for “expert” verification will be very high, both financially and in time spent and will significantly impact the viability of our enterprise. We note that unlike the PC1 changes for urban areas, the financial implications rurally on these properties fall directly onto individual landowners.

- Under the current proposal many people will be non-compliant within a short timeframe and find themselves faced with prosecution. We submit that the proposed time to transition between current land use and implementing the proposed changes (if in fact this is required) is unrealistically short and does not account for significant financial implications, required changes in the farm system and potential changes in land use.
- More detail is provided in our submission below.

Submitter background – Riu Huna Farm

Our 43.7 ha property comprises 2 separate blocks of land on separate titles, 1 of 4.04 ha (purchased 1972), the other 39.75 ha (purchased 1992).

Originally, much of the steep 4-hectare block was rough pasture, with some regenerating native bush and mostly the usual Makara gorse, tahinau, and scrub.

The larger block at time of purchase was historically part of one of the town milk supply farms for Wellington but had been allowed to revert over time to generally rough pasture and gorse and natives in deep gullies that had survived burn-offs. Having no internal fencing, all areas were open for animals to graze - at this time principally sheep. This property rises steeply from the base of the Makara Valley to 140 m altitude at the western boundary of the farm. It first levels off after 119 m where it descends again to form a second valley running parallel to the main Makara valley below (hence our farm name of Riu Huna or Hidden Valley). A very small stream runs down the centre of the valley with several minor springs and trickles feeding it – these often dry up in summer and other dry periods.

From 1993 through to 2001, we fenced off and commenced the planting of a plantation forestry of *Pinus radiata* on the steep slopes on the eastern side of the farm downslope from the hill faces facing the Makara stream. Much of this forest is now registered in the New Zealand Emissions Trading Scheme as permanent forest.

Subsequently we commenced internally fencing the valley used for grazing, put in a full water supply to all paddocks, we regularly tested the soil, limed, and fertilised as required to improve the pasture growth which was essentially native brown top grasses which mostly died off in the summer.

This work included implementing riparian planting during which so far 0.51 ha has been fenced in riparian strips around the small creek and several seeps, planted in combination of native and exotic trees and shrubs and fenced off currently using 1 km of fencing on the parameters.

We currently graze the remnant members of a fold of highland cattle – originally used for breeding and some sheep. Note that highland cattle are extensively used in Europe and the US for conservation grazing, being relatively light in weight reducing ground impacts including pugging of the ground in winter. All sheep are kept away from water courses.

Current situation

As of today, after many years of development, the land usage comprises:

1. 20.67 ha pasture which includes about 0.6 Ha of mature native bush not grazed by animals but occasionally used for shelter in bad weather. This is internally fenced into 11 main paddocks (with several additionally further divided).
2. Plantings and shelterbelts. Combined *Pinus radiata* and tree lucerne shelter belts have been established - we tried several times over different seasons growing poplars and willows as additional shelter and potential erosion control in the pasture paddocks, but the winds put paid to the vast bulk of them very swiftly. *Pinus radiata* has been the only species we have found that survived the wind; even established adult self-seeded Ngaios have been uprooted and toppled in gale conditions. We tried over 50 poplar poles of different poplar varieties; the planted techniques were as advised and additionally the poles were strengthened with steel waratahs to try and brace them further against the weather and stock. Of these many poles planted currently only four survive; all of which are in positions where they are sheltered by the *Pinus radiata* shelter belts. Note we had no subsidies or assistance from GWRC any other agency to fence and plant either the poles or our riparian areas.
3. 0.51 ha has been fenced in riparian strips around the small creek and several seeps, planted in combination of native and exotic trees and shrubs and fenced off currently using 1 km of fencing on the parameters.
4. There is 5.56 ha of significant native bush in gullies which survived historic fires and gorse burn-offs in the section fenced off from stock. We placed this under QEII covenant in 2006 to preserve a beautiful and now valuable remnant of local coastal native bush. This is now under permanent protection.
5. An additional 12.61 ha of native bush and fenced-off *Pinus radiata* plantations have been placed in ETS permanent forest scheme.
6. The remainder of the 4 hectares or so comprises native bush regeneration not included in ETS scheme, amenity plantings, house, farm and house sheds. None of this used for grazing.
7. A full reticulated water supply and troughs has been extended to all paddocks in the farm.
8. The main small stream in the grazed areas of Riu Huna farm contains a healthy population of koura, eels in the ponds, and galaxiids.
9. Streams passing through multiple properties. One item not addressed in the meeting was the situation where our farm stream originates on Makara farm (on our western boundary), passes through another block, continues down our valley, and then moves on to another property. Most of the legislation appears to assume that watercourses are limited in scope to the property in question, are only the responsibility of the landholders themselves, and does not appear to account for potential pollution, or contamination coming from other properties.

Submission

Consultation process.

We only found out about the Plan Change through our community channels when a GWRC presentation in Ohariu was organised less than three weeks before these submissions were required. GWRC's community engagement to consult on this Plan Change is sadly lacking noting the

significant and direct impact that their proposed changes will have on us. We would ask why there has not been:

- a. Direct mail contact with us and other rural property owners. We would have been clearly identified through council's rating database.
- b. Any formal engagement with our Community Board; and
- c. Information on the GWRC website in an easily accessible and relevant form. The written information on the proposed plan change before the meeting was provided to us from local sources (not by GWRC). This was highly complex, difficult to follow, and much was not relevant to our area. There was certainly insufficient time to understand the documents, find some of the references which were missing from the document, and fully understand the ramifications and requirements on us. We submit that this does not represent any realistic or substantial communication or any attempt to receive meaningful community feedback. We acknowledge the efforts of the GWRC staff in holding the workshop and thank those involved, however we suggest that a 90-minute presentation to the many attendees who had so many questions was insufficient to provide anything like the information required for us to make any informed decisions.

The timing of the consultation when things are very busy seasonally on a farm and only several weeks before Christmas is frankly unworkable. In our view this situation at the worst could be interpreted as a cynical attempt by the regional council to bulldoze through these plan changes under the guise of consultation or more generously is simply unrealistic, with little understanding and regard for this community and shows little understanding of farming activities and timetables.

We note additionally that the new national regulations have yet to be timetabled in this area. We submit that the transition time should be based on the timeframes for when new freshwater regulations come into effect from central government - not in advance, which appears to be the case. It is unclear why GWRC is jumping the gun and duplicating that process in our area when this is not currently required.

Cost. Despite our many years as kaitiaki of this property, as detailed in our background section, these measures appear to assume a worst-case scenario in water quality and do not account for any historical improvements carried out. The cost of implementing the proposed changes on our farm assuming the requirement for a farm plan and for "expert" verification for a will be very high, both financially and in time allocated, and will significantly impact the viability of our enterprise. We note that unlike the PC1 changes for urban areas, the financial implications on rural properties fall directly onto individual landowners. To be cynical, given the obvious lack of resourcing in the GWRC during this 'consultative phase' will provide a fertile and ongoing feeding ground for expensive consultancies to fill this gap and continue the exercise as long as they can. The PCI does not allow any flexibility to prioritise or progressively stage work over time. Should this plan progress we recommend GWRC consider a range of support mechanisms to help reduce these costs that will be directly borne by us. "Non-regulatory" support needs to be included as a more detailed provision in PC1 – it should clearly state that extra resourcing will be provided by the GWRC and what assistance the council will provide to farmers to support implementation.

Lack of information supporting the proposed changes with subsequent inability to effect required results. We submit that there has been insufficient information provided to identify any clear problem or problem location with water quality in our area. This obviously impacts on our ability to effectively target any remediation or work to improve this. As highlighted in our background section we have already made many changes to reduce sedimentation and potential deposition of biological pollution in the small streams of our property. These include retiring over half the farm from grazing and subsequently planting trees on this section of the property for stability and the implementation of riparian plantings and fencing in the grazed areas. We submit that the wider sources of contaminants (both by activity and by location) across Mākara and Ohariu is highly speculative as there is only one water quality monitoring site across Mākara and Ohariu's full 15,000 hectares and it only relates to the 8,000-hectare Mākara Stream catchment. We note there is little acknowledgement of the major flooding several years ago, a huge remedial and construction program carried out through the Takarau Gorge over the past four years, including work within the river and on the riverbanks, and an increasing number of houses under construction; particularly in the Ohariu catchment with consequent potential for erosion and increased sedimentation.

The PC1 mapping provided (noting the very coarse level of the provided map) does not correspond to our experience of our local area over the more than 50 years we have lived here. This disconnect between the model and reality is a common thread in this community, and we thus question the accuracy of the modelled scenarios which are going to be used with potentially devastating effects on landowners. We also question the accuracy of the soil type analysis. In summary, we suggest that modelling is coarse and is not fit for purpose. We also note that we were certainly available for any on-site studies should the GWRC have undertaken a proper ground truthing exercise rather than the broad modelling (modelling in many cases used only in the absence of accurate "real" information and often as a cost effective but inaccurate shortcut).

We believe based on the healthy population of invertebrates and fish in our small streams, we already have good water quality. Despite this, the proposed plan will still potentially impose very stringent land use rules on us. We see this proposed plan change as a blunt instrument attempting to compensate for the lack of 'actual' local water quality information at a reasonable number of sites and frequency by proposing broad rules across multiple catchments rather than targeting usable and effective interventions for the best outcomes. These very wide-ranging proposed regulatory implications will create additional financial and time costs on us, will have a negative impact on our mental health due to potential penalties and unrealistic timeframes if we miss something, and comes with a strong risk of not achieving the (unclear) outcomes efficiently or effectively. Under the current proposal many people will be non-compliant within a short timeframe and find themselves faced with prosecution. We submit that the proposed time to transition between current land use and implementing the proposed changes is unrealistically short and does not account for significant financial implications, requires potentially unneeded changes in our farm system and in land use. It is highly disappointing that there was no attempt by the CGWR to reach out to the local community and individual landowners earlier given the huge potential impact this could have on our community and farmers.

In summary, we submit that solutions are best achieved on-farm and by individual property rather than the wider approach based on the current whaitua or "Freshwater Management Unit".

However, many of these small streams cross property boundaries (in our case our main stream passes through two properties before us and one after) and therefore must be implemented and monitored at an appropriate scale.

Potential for perverse outcomes. We suggest that there may be perverse consequences as these measures impose more cost and reduce the ability of farmers to operate economically. As an example, there is the potential that making larger properties uneconomic may result in owners subdividing properties with a consequent increase in the number of houses on the land, increased sedimentation due to additional building activities, trackwork, fencing, septic tanks et cetera.

Methods			
Method M44: Supporting the health of rural waterbodies	Support	We ask GWRC to prioritise this work prior to implementing new rules.	<p>We are pleased to see that a range of financial support options for land retirement are proposed, including rates relief. We would like to see this also include compensation if large-scale land retirement progresses.</p> <p>We are also pleased to see the farm-scale approach promoted here and ask that it is better integrated into PC1's sediment and erosion control policies and rules.</p>
Method M44: Supporting the health of rural waterbodies	Amend	Include increased GWRC support for additional water quality monitoring activities in Mākara and Ohariu, including community-led.	The lack of local water quality monitoring data means GWRC has had to make assumptions based on modelling, which we believe are not fit for purpose. The lack of data also makes it difficult for us to see where the water quality is and therefore what solutions to implement on farm.
Policies			
Policy WH.P21 (e-coli)	Amend	Add "Identification of sources of e-coli specific to individual catchments".	The source of high e-coli levels in Mākara Stream is unknown and there are several potential sources (livestock, septic tanks, waterfowl). The sources need to be known for each catchment in order for them to be addressed. Some parts of the wider Mākara Stream catchment, and many streams outside the catchment, will likely not have an e-coli issue.
Policy WH.P21 (e-coli)	Amend	Add "Incorporate e-coli reduction in catchment context and farm plans, based on monitored data" – to allow a farm-scale approach as per nitrogen and sediment.	<p>Lack of consistency with WH.P22 (nitrogen) and WH.P23 (sediment). Work to reduce E-coli levels should only target areas where e-coli is shown to be an issue. There is not currently sufficient monitoring data to determine the levels and sources of e-coli across the multiple catchments. It is inappropriate to extrapolate the results of one monitoring site across all of Mākara and Ohariu, given the differences in catchments/sub-catchment.</p> <p>Local water quality studies need to be carried out and the option for landowner farm-scale monitoring provided for –</p>

			including feedback loops to monitor the impact of actions.
Policy WH.P23 (a) (sediment – identifying high risk land)	Amend	<p>Identify sediment sources by using a farm-scale assessment of sediment sources rather than the erosion-risk mapping in PC1.</p> <p>Refocus this section on identifying “sediment sources” rather than erosion risk land/pasture.</p>	<p>The PC1 mapping does not correspond well with ground-truthed information on erosion from landowners who have worked with the land for multiple generations. Concerned about both the accuracy of the modelled scenarios and that it might not include accurate analysis of soil types. The modelling is coarse and is not fit for purpose in Mākara/Ohariu.</p> <p>This policy includes generic assumptions on the source of sediment. Concerned that the policy focuses on hill country erosion as a source of sediment and not streambank erosion in high flow events – anecdotally a much higher contributor to sediment loss. We do support revegetation of vulnerable areas of farms in order to reduce flood flows and streambank erosion – but there are multiple options for revegetation sites that best work within the farm system.</p> <p>The area forced into retirement will be much bigger than the red areas mapped due to the need to aggregate areas and work with the landscape to locate sensible fencelines.</p> <p>Allow for a much more accurate assessment of <u>risk</u> on individual farms by assessment of sediment sources at the farm-scale.</p>
Policy WH.P23 (b) (Sediment – Erosion Risk Mgt Plans)	Amend	Refocus from “erosion risk” to “sediment management”.	<p>As per above, the sources of sediment are likely broader than erosion on hillsides. This will help also acknowledge other existing sediment management techniques such as low stocking rates and good pasture cover.</p>
Policy WH.P23 (c) (Sediment – requirement for revegetation)	Oppose	Remove this blanket approach and instead rely on the bespoke actions and timeframes that will be identified through farm-scale assessment, including via the audited Freshwater Farm Plans.	<p>This provision will financially cripple many farms given the large area, timeframes and requirement to retire the land. The removal of vegetation from this landscape occurred many generations ago yet the revegetation is required to be implemented by current owners within a short timeframe.</p> <p>The “woody vegetation” will likely need to be natural reversion since using poplars and willows (alongside grazing) is unlikely to be successful on these steepest areas given the high-wind nature of our landscape - and based on people’s own trial work to date. Therefore fencing and retirement will be the only tool available.</p> <p>This area has unique challenges with revegetation projects, in large part due to the high winds.</p>

			<p>Native planting will not be affordable on this scale and natural reversion in the top of this landscape will take a very long time to establish, including a significant period through gorse, creating a seed source within farms. The provision's requirement to "maintain" the woody vegetation will be unviable, given the large-scale land retirement and reduced farm income from less productive land and high fencing costs incurred. Another challenge to revegetation projects is working alongside Meridian's wind farms (crossing six of our farms) where afforestation needs to be designed to not impede wind flow.</p> <p>The policy relies on modelling that we believe is innaccurate. It makes no sense to retire farmland where there is no actual erosion issue.</p>
Policy WH.P26 (Livestock access to small rivers)	Amend	<p>Replace "restrict" with "reduce".</p> <p>Amend the policy wording to match the heading about river size.</p>	<p>Make consistent with the associated Rule regarding reduced access rather than restricted access.</p> <p>We support revegetating streams but are limited by the number of small streams in our extremely hilly landscape, and therefore the high cost and the practicality of fencing some of these areas, especially in areas with consecutive gullies or in areas that are flood zones.</p> <p>Farm-scale analysis of risk and solutions is critical – rather than blanket restrictions. There is a risk to increased animal welfare issues if livestock do not have access to streams for drinking water, due to standard risks of reticulated water supply infrastructure functioning well in hill country paddocks. A farm-scale approach needs to be supported to help deliver solutions such as sediment retention / stockwater ponds.</p>
Policy WH.P27 (Promoting stream shading)	Support		<p>We recognise the value of riparian planting of natives and poplar/willows for shade and are many of us have been actively delivering this work to date. In our area, this often also helps in streambank stabilisation.</p>
Rules			
Rule WH.R27 (Farming activities on 20+ ha)	Amend	<p>Ensure that the details of this rule are consistent with the content and timing for Freshwater Farm Plans</p>	<p>We do not want to double up on farm plan work when an existing process is already in play under national regulation.</p>
Rule WH.R28 and R29 (Access to small river)	Oppose	<p>Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.</p>	<p>Also refer to comments against Policy WH.P26.</p>