Once you have completed your feedback, please email to regionalplan@gw.govt.nz

Fensaughty Partnership - Riu Huna Farm
Jack Fenaughty
Insert
jack.fenaughty@gmail.com
Yes
Yes
No
Select A or B
gtion, I agree to having read and understood d in this Information Statement
Signature
Insert
1

Chapter No and Name	Provision No. & Title	Type of Change	Stance	RMA Process	Reason for feedback:	Decision Sought *
		Amended	Support	Freshwater	Please provide a	Please describe the actual changes to the provision
		New Not applicable to	Oppose Neutral	Part 1 Schedule 1 Both	summary of the reasons for your	that you would like to see and, where possible, include your suggested alternative wording.
		Whaitua	Amend		feedback on each	
		Not applicable to Te-Awarua-o-	Not stated		provision to help	NOTE: Any deletions should be identified using strikethrough, and insertions should be identified
		Porirua			position.	using <b>bold</b> .
2 Interpretation	2.2 Definitions	<i>N/A</i> Amended		Both		
	Afforestation	New	Select stance	Freshwater		
	Allocation amount Annual stocking rate	Amended New	Select stance Select stance	Part 1 Schedule 1 Freshwater		
	Catchment management unit	Amended	Select stance	Part 1 Schedule 1		
	Coastal water management units	New	Select stance	Part 1 Schedule 1		
	Containment standard Core allocation	New Amended	Select stance Select stance	Part 1 Schedule 1 Part 1 Schedule 1		
	Dry weather discharges	New	Select stance	Part 1 Schedule 1		
	Earthworks Effective hectares	New New	Select stance Select stance	Part 1 Schedule 1 Freshwater		
	Environmental outcomes	New	Select stance	Part 1 Schedule 1		
	Erosion and sediment management plan Erosion risk treatment plan	New	Select stance Select stance	Freshwater Freshwater		
	Existing wastewater discharge	New New	Select stance	Part 1 Schedule 1		
	Harbour arm catchments	New	Select stance	Part 1 Schedule 1		
	Harvesting High risk industrial or trade premise	New New	Select stance Select stance	Freshwater Part 1 Schedule 1		
	Highest erosion risk land (plantation	New	Select stance	Freshwater		
	forestry) Highest erosion risk land (pasture)	New	Select stance	Freshwater		
	High erosion risk land (pasture)	New	Select stance	Freshwater		
	Highest erosion risk land (woody	New	Select stance	Freshwater		
	vegetation) Hydrological control	New	Select stance	Part 1 Schedule 1	+	
	Impervious surfaces	New	Select stance	Part 1 Schedule 1		
	Intensive grazing Limit	New New	Select stance Select stance	Freshwater 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 Part Freshwater Management Unit	New New	Select stance Select stance	Freshwater 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 Replanting	New New	Select stance Select stance	Freshwater Freshwater		
	Sacrifice paddocks	New	Select stance	Freshwater		
	Small stream riparian programme Stabilisation	New New	Select stance Select stance	Freshwater Part 1 Schedule 1		
	Stormwater	Amended	Select stance	Part 1 Schedule 1		
	Stormwater catchment or sub-catchment	New New	Select stance Select stance	Part 1 Schedule 1 Part 1 Schedule 1		
	Stormwater management strategy Stormwater network	Amended	Select stance	Part 1 Schedule 1		
	Stormwater treatment system	New	Select stance	Part 1 Schedule 1		
	Stocking rate Stock unit	New New	Select stance Select stance	Freshwater 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-	New	Select stance	Part 1 Schedule 1		
	catchment					
	Wet weather overflows Whaitua	New Amended	Select stance Select stance	Part 1 Schedule 1 Part 1 Schedule 1		
	Winter Stocking rate	New	Select stance	Freshwater		
3 Objectives	Amendments to Chapter 3 - Objectives	Not applicable to		Part 1 Schedule 1		
	Objective O2	Whaitua Not applicable to	Select stance	Part 1 Schedule 1		
		Whaitua				
	Objective O5	Not applicable to Whaitua	Select stance	Freshwater		
	Objective O6	Not applicable to	Select stance	Part 1 Schedule 1	1	
	Objective 017	Whaitua	Soloct stores			
	Objective O17	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O20	Not applicable to	Select stance	Part 1 Schedule 1	1	
	Objective O34	Whaitua Not applicable to	Select stance	Part 1 Schedule 1	+	
		Whaitua				
	Objective O35	Not applicable to	Select stance	Part 1 Schedule 1		
	Objective O36	Whaitua Not applicable to	Select stance	Part 1 Schedule 1		
		Whaitua				
	Objective O37	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	Objective O38	Not applicable to	Select stance	Part 1 Schedule 1	1	
	3.6 Water quality	Whaitua Amended/Not		Part 1 Schedule 1		
	S.o water quality	applicable to				
		Whaitua				
	Objective O18: Rivers, lakes, natural wetlands and coastal water are suitable for	Amended	Select stance	Part 1 Schedule 1		
	contact recreation and Māori customary					
	USE.	Notangliashi	Soloct stores			
	Table 3.1 Primary contact recreation and Māori customary use objectives in	Not applicable to Whaitua	Select stance	Part 1 Schedule 1		
	freshwater bodies.			Part 1 Schedule 1	1	
	Table 3.2 Secondary contact and Māori	Amended	Select stance			
	Table 3.2 Secondary contact and Māori customary use recreation objectives in freshwater bodies.					
	Table 3.2 Secondary contact and Māoricustomary use recreation objectives infreshwater bodies.Table 3.3 Contact recreation and Māori	Not applicable to	Select stance Select stance	Part 1 Schedule 1		
	Table 3.2 Secondary contact and Māori customary use recreation objectives in freshwater bodies.					

				_	
	Objective O19: Biodiversity, aquatic ecosystem health and mahinga kai in fresh	Amended	Select stance	Part 1 Schedule 1	
	water bodies and the coastal marine area are safeguarded.				
		Not applicable to Whaitua	Select stance	Part 1 Schedule 1	
		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	
		Not applicable to Whaitua	Select stance	Part 1 Schedule 1	
	,	Amended Amended	Select stance	Part 1 Schedule 1 Part 1 Schedule 1	
	identified in Schedule A (outstanding water bodies) and their significant values are				
	protected and restored. Objective O28: Ecosystems and habitats	Amended	Select stance	Part 1 Schedule 1	
	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				
		Not applicable to		Part 1 Schedule 1	
		Whait / Not applicable to			
4 Policies		Whaitua Te Awarua-o-Porirua			
		Not applicable to Whaitua	Select stance	Freshwater	
	discharge consents.	Not applicable to	Select stance	Part 1 Schedule 1	
	use activities.	Whaitua Not applicable to	Select stance	Part 1 Schedule 1	
	nutrients.	Whaitua			
	Policy P72: Priority Catchments.	Not applicable to Whaitua	Select stance	Freshwater	
	environment plans in priority catchments.	Not applicable to Whaitua	Select stance	Freshwater	
		Not applicable to Whaitua	Select stance	Part 1 Schedule 1	
	associated diffuse discharges of contaminants.				
		Not applicable to Whaitua	Select stance	Part 1 Schedule 1	
	Policy P77: Improving water quality for	Not applicable to Whaitua	Select stance	Part 1 Schedule 1	
	use.			5	
	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	
		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	Not applicable to Whaitua	Select stance	Part 1 Schedule 1	
	authority and state highway network	Whattaa			
	consents. Policy P86: Second-stage local authority and		Select stance	Part 1 Schedule 1	
	Policy P87: Minimising wastewater and	Whaitua Not applicable to	Select stance	Part 1 Schedule 1	
	stormwater interactions. Policy P88: Assessing resource consents to	Whaitua Not applicable to	Select stance	Part 1 Schedule 1	
	discharge stormwater containing wastewater.	Whaitua			
	Policy P118: Water takes at minimum flows and minimum water levels.	Not applicable to Te Awarua-o-	Select stance	Freshwater	
		Porirua Whaitua Not applicable to	Select stance	Freshwater	
		Te Awarua-o-		an conwater	
	4.6 Biodiversity, aquatic ecosystem health	Porirua Whaitua Amended		Part 1 Schedule 1	
	, , , , ,	Amended	Select stance	Part 1 Schedule 1	
	health and mahinga kai. 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. 4.9.1 Discharges to land and water.	Amended Amended	Select stance	Part 1 Schedule 1 Part 1 Schedule 1	
	Policy P78: Managing point source discharges for aquatic ecosystem health	Amended	Select stance	Part 1 Schedule 1	
5 1 Air quality rules	and mahinga kai.	Amended		Part 1 Schedule 1	
5.1 Air quality rules	5.1.2 Outdoor burning. Rule R1: Outdoor burning – permitted	Amended Amended	Select stance	Part 1 Schedule 1 Part 1 Schedule 1	
	activity. Rule R3: Outdoor burning for firefighter	Amended	Select stance	Part 1 Schedule 1	
	training – permitted activity. 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. Rule R10: Untreated wood – permitted	Amended Amended	Select stance Select stance	Part 1 Schedule 1 Part 1 Schedule 1	
	activity. Rule R11: Coal, light fuel oil, and petroleum		Select stance	Part 1 Schedule 1	
	distillates of higher viscosity – permitted	ended			
		Amended	Select stance	Part 1 Schedule 1	
	permitted activity. 5.1.5 Chemical and metallurgical	Amended		Part 1 Schedule 1	
		Amended	Select stance	Part 1 Schedule 1	
	space – permitted activity.				

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Addit in granteria or into in the dataNot. 200Not. 200 </td <td>Rule R15: Spray coating not within an enclosed space – permitted activity.</td> <td>Amended</td> <td>Select stance</td> <td>Part 1 Schedule 1</td> <td></td>	Rule R15: Spray coating not within an enclosed space – permitted activity.	Amended	Select stance	Part 1 Schedule 1	
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	catchments – permitted activity.	Whaitua	Colortatores	Freehuuster		
		Not applicable to Whaitua	Select stance	Freshwater		
		Not applicable to Whaitua	Select stance	Freshwater		
	· · ·	Amended		Part 1 Schedule 1		
	general conditions. Beds of lakes and rivers general conditions.	Amended	Select stance	Part 1 Schedule 1		
		Amended		Freshwater		
	Rule R128: New structures – permitted		Select stance	Freshwater		
	6	Amended	Select stance	Freshwater		
	extraction – permitted activity. Rule R133: Gravel extraction for flood	Amended	Select stance	Freshwater		
	protection purposes or erosion mitigation inside sites of significance – discretionary activity.					
	5.4.7 All other uses of the beds of lakes	Amended		Part 1 Schedule 1		
	and rivers. Rule R145: All other uses of river and lake	Amended	Select stance	Part 1 Schedule 1		
	beds – discretionary activity.	N1 .				
		New New	Select stance	Freshwater Freshwater		
	permitted activity.					
		Not applicable to Te Awarua-o- Porirua Whaitua		Freshwater		
	Rule R152: Take and use of water –	Not applicable to	Select stance	Freshwater		
		Te Awarua-o- Porirua Whaitua	Caller of the	Free days in the		
	cooling water – permitted activity.	Te Awarua-o-	Select stance	Freshwater		
	Rule R154: Water races – permitted activity.	Porirua Whaitua Not applicable to	Select stance	Freshwater		
		Te Awarua-o- Porirua Whaitua				
	Rule R157: Take and use of water –	Not applicable to	Select stance	Freshwater		
	,	Te Awarua-o- Porirua Whaitua				
		Not applicable to Te Awarua-o-	Select stance	Freshwater		
6 Other methods		Porirua Whaitua New		Freshwater		
	Method M36: Freshwater Action Plan	New	Select stance	Freshwater		
	programme. Method M37: Freshwater Action Plan for	New	Select stance	Fueshington		
			Jelett stante	Freshwater		
	the Parangarahu Lakes. Method M28: Freshwater Action Plan for	Now				
		New	Select stance	Freshwater		
	Method M38: Freshwater Action Plan for the Rangituhi catchment. Method 39: Freshwater Action Plan for	New New				
	Method M38: Freshwater Action Plan for the Rangituhi catchment. Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and		Select stance	Freshwater		
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	Method M38: Freshwater Action Plan for the Rangituhi catchment. 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 Select stance	Freshwater Part 1 Schedule 1		
	Method M38: Freshwater Action Plan for the Rangituhi catchment. Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a- Tara and Te Awarua-o-Porirua Whaitua. Method M41: Identifying and responding to	New New	Select stance Select stance	Freshwater Part 1 Schedule 1		
	Method M38: Freshwater Action Plan for the Rangituhi catchment. Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a- Tara and Te Awarua-o-Porirua Whaitua.	New New	Select stance Select stance Select stance	Freshwater Part 1 Schedule 1 Freshwater		
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	Method M38: Freshwater Action Plan for the Rangituhi catchment. Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a- Tara and Te Awarua-o-Porirua Whaitua. Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. <b>6.17 Small farm property registration</b>	New New New	Select stance Select stance Select stance Select stance	Freshwater Part 1 Schedule 1 Freshwater Freshwater		
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	Method M38: Freshwater Action Plan for the Rangituhi catchment. Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a- Tara and Te Awarua-o-Porirua Whaitua. Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. <b>6.17 Small farm property registration</b> Method M42: Small farm property registration within Whaitua Te Whanganui- a-Tara and Te Awarua-o-Porirua Whaitua. <b>6.16 Supporting improved water quality</b> <b>outcomes.</b> Method M43: Supporting the health of urban waterbodies. Method M44: Supporting the health of rural	New New New New New New New New	Select stance	Freshwater Part 1 Schedule 1 Freshwater Freshwater Part 1 Schedule 1 Part 1 Schedule 1 Part 1 Schedule 1 Part 1 Schedule 1	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	to implmenting new rules. Include increased GWRC support for additional water quality monitoring activities in Mākara and Ohariu, including community-
	Method M38: Freshwater Action Plan for the Rangituhi catchment. Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a- Tara and Te Awarua-o-Porirua Whaitua. Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. <b>6.17 Small farm property registration</b> Method M42: Small farm property registration within Whaitua Te Whanganui- a-Tara and Te Awarua-o-Porirua Whaitua. <b>6.16 Supporting improved water quality</b> <b>outcomes.</b> Method M43: Supporting the health of urban waterbodies. Method M44: Supporting the health of rural waterbodies.	New New New New New New New New	Select stance	Freshwater Part 1 Schedule 1 Freshwater Freshwater Part 1 Schedule 1 Part 1 Schedule 1 Part 1 Schedule 1 Part 1 Schedule 1	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	support for additional water quality monitoring activities in Mākara and Ohariu, including community-
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Objective WH.O1: The health of all freshwater bodies and the coastal marine	New	Select stance	Part 1 Schedule 1	
area within Whaitua Te Whanganui-a-Tara				
is progressively improved and is wai ora by 2100.				
Objective WH.O2: The health and wellbeing	New	Select stance	Freshwater	
of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their				
margins are on a trajectory of measurable				
improvement towards wai ora.				
Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and	New	Select stance	Part 1 Schedule 1	
habitats in Te Whanganui-a-Tara is				
maintained or improved to achieve the coastal water objectives set out in Table				
8.1.				
Table 8.1 Coastal water objectives. Objective WH.O4: The extent, condition,			Part 1 Schedule 1 Part 1 Schedule 1	
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.				
Objective WH.O5: By 2040 the health and	New	Select stance	Freshwater	
wellbeing of the Parangarahu Lakes and				
associated natural wetlands are on a trajectory of improvement towards wai ora.				
	Now	Salact starss	Frachwater	
Objective WH.O6: Groundwater flows and	New New	Select stance Select stance	Freshwater Freshwater	
levels, and water quality, are maintained. Objective WH.07: The physical integrity of	New	Select stance	Freshwater	
aquitards is protected so that confined				
aquifer pressures are maintained. Objective WH.08: Primary contact sites	New	Select stance	Freshwater	
within Te Awa Kairangi/Hutt River,				
Pākuratahi River, Akatarawa River and Wainuiomata River are suitable for primary				
 contact.	A1	Colort stores	Fue character	
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	New	Select stance	Freshwater	
 rivers are maintained or improved.				
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	New	Select stance	Part 1 Schedule 1	
water objectives.				
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	New	Select stance	Freshwater	
required to achieve the visual clarity target attribute states.				
Policy WH.P5: Localised adverse effects of point source discharge.	New	Select stance	Part 1 Schedule 1	
Policy WH.P6: Cumulative adverse effects of	New	Select stance	Part 1 Schedule 1	
 point source discharges. Policy WH.P7: Discharges to groundwater.	New	Select stance	Freshwater	
Policy WH.P8: Avoiding discharges of	New	Select stance	Part 1 Schedule 1	
specific products and waste. Policy WH.P9: General stormwater policy to	New	Select stance	Part 1 Schedule 1	
achieve the target attribute states and coastal water objectives.				
Policy WH.P10: Managing adverse effects of	New	Select stance	Part 1 Schedule 1	
stormwater discharges. Policy WH.P11: Discharges of contaminants	New	Select stance	Part 1 Schedule 1	
in stormwater from high risk industrial or				
trade premises. Policy WH.P12: Managing stormwater from	New	Select stance	Part 1 Schedule 1	
 a port or airport.				
Policy WH.P13: Managing stormwater network discharges through a Stormwater	New	Select stance	Part 1 Schedule 1	
Management Strategy. Policy WH.P14: Stormwater discharges	New	Select stance	Part 1 Schedule 1	
		Select Statice	rait I Scheuule I	
from new and redeveloped impervious			I	
from new and redeveloped impervious surfaces.	New	Select stance	Part 1 Schedule 1	
from new and redeveloped impervious surfaces.	New	Select stance	Part 1 Schedule 1	
from new and redeveloped impervious surfaces. Policy WH.P15: Stormwater contaminant	New		Part 1 Schedule 1 Part 1 Schedule 1	
from new and redeveloped impervious surfaces. Policy WH.P15: Stormwater contaminant offsetting for new greenfield development. Policy WH.P16: Stormwater discharges from new unplanned greenfield				
from new and redeveloped impervious surfaces. Policy WH.P15: Stormwater contaminant offsetting for new greenfield development. Policy WH.P16: Stormwater discharges from new unplanned greenfield development.		Select stance		
from new and redeveloped impervious surfaces. Policy WH.P15: Stormwater contaminant offsetting for new greenfield development. Policy WH.P16: Stormwater discharges from new unplanned greenfield development. Policy WH.P17: General wastewater policy to achieve target attribute states and	New	Select stance	Part 1 Schedule 1	
from new and redeveloped impervious surfaces. Policy WH.P15: Stormwater contaminant offsetting for new greenfield development. Policy WH.P16: Stormwater discharges from new unplanned greenfield development. Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives. Policy WH.P18: Progressing works to meet	New	Select stance	Part 1 Schedule 1	
from new and redeveloped impervious surfaces. Policy WH.P15: Stormwater contaminant offsetting for new greenfield development. Policy WH.P16: Stormwater discharges from new unplanned greenfield development. Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	New New	Select stance Select stance Select stance	Part 1 Schedule 1 Part 1 Schedule 1	
from new and redeveloped impervious surfaces. Policy WH.P15: Stormwater contaminant offsetting for new greenfield development. Policy WH.P16: Stormwater discharges from new unplanned greenfield development. Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives. Policy WH.P18: Progressing works to meet Escherichia coli target attribute states. Policy WH.P19: Managing wastewater network catchment discharges.	New New New	Select stance Select stance Select stance Select stance	Part 1 Schedule 1 Part 1 Schedule 1 Freshwater Part 1 Schedule 1	
from new and redeveloped impervious surfaces. Policy WH.P15: Stormwater contaminant offsetting for new greenfield development. Policy WH.P16: Stormwater discharges from new unplanned greenfield development. Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives. Policy WH.P18: Progressing works to meet Escherichia coli target attribute states. Policy WH.P19: Managing wastewater	New New New	Select stance Select stance Select stance Select stance	Part 1 Schedule 1 Part 1 Schedule 1 Freshwater	

Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	New	Amend	Freshwater	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 cathcment, will likely not have an e- coli issue. Lack of consistency with WH.P22 (nitorgen) and WH.P23 (sediment). Work to reduce E- coli levels should	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	New	Select stance	Freshwater	only target areas	
from farming activities. Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.		Amend	Freshwater	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	
Policy WH.P24: Phasing of farm	New	Select stance	Part 1 Schedule 1	the sources of	
environment plans.			Freshwater		
	New	Amend	Freshwater	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	Replace "restrict" with "reduce". Amend the policy wording to match the heading about river size.

Policy WH.P27: Promoting stream shading.	New	Support	Freshwater	a.) At Riu Huna to	a). We recognise the value of riparian plantings of all
				date 0.51 ha has	usable types for shade and stabilisation and have
				been fenced in	invested a lot of our own time and money into this on Riu Huna with no external support from any agency.
				riparian strips around the main	Our committement to this indicates support for the
				small creek and	measure. b.) Ensure that the details of this rule are
				several seeps,	consistent with the content and timing for Freshwater
				planted in	Farm Plans
				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	
Policy WH.P28: Achieving reductions in	New	Select stance	Freshwater	regulation.	
sediment discharges from plantation					
forestry.					
Policy WH.P29: Management of	New	Select stance	Part 1 Schedule 1		
earthworks. Policy WH.P30: Discharge standard for	New	Select stance	Part 1 Schedule 1		
earthworks.					
Policy WH.P31: Winter shut down of	New	Select stance	Part 1 Schedule 1		
earthworks.	Nou		Freekuste		
8.2.5 Water allocation Policy WH.P32: Minimum flows and	New New	Select stance	Freshwater Freshwater		
minimum water levels in Whaitua Te					
Whanganui-a-Tara.					
,	New	Select stance	Freshwater		
Te Whanganui-a-Tara. 8.3 Rules	New		Both		
8.3.1 Discharges of contaminants	New		Part 1 Schedule 1		
	New	Select stance	Part 1 Schedule 1		
specific contaminants – prohibited activity.					
			D. II		
8.3.2 Stormwater Rule WH.R2: Stormwater to land –	New New	Select stance	Both Freshwater		
permitted activity.	NEW		ווכאוושמנפר		
	New	Select stance	Part 1 Schedule 1		
-		Select statice	Part I Schedule I		
individual property to surface water or		Select statice	Part I Schedule I		
coastal water – permitted activity.					
coastal water – permitted activity. Rule WH.R4: Stormwater from an existing	New	Select stance	Part 1 Schedule 1		
coastal water – permitted activity.					
coastal water – permitted activity. Rule WH.R4: Stormwater from an existing high risk industrial or trade premise –					
coastal water – permitted activity. Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity. Rule WH.R5: Stormwater from new and redeveloped impervious surfaces –	New	Select stance	Part 1 Schedule 1		
coastal water – permitted activity. Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity. Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.	New New	Select stance Select stance	Part 1 Schedule 1 Part 1 Schedule 1		
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<ul> <li>coastal water – permitted activity.</li> <li>Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.</li> <li>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.</li> <li>Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.</li> <li>Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.</li> <li>Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity.</li> <li>Rule WH.R9: Stormwater from a local authority or state highway</li> </ul>	New New New New	Select stance Select stance Select stance Select stance Select stance	Part 1 Schedule 1		
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<ul> <li>coastal water – permitted activity.</li> <li>Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.</li> <li>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.</li> <li>Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.</li> <li>Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.</li> <li>Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity.</li> <li>Rule WH.R9: Stormwater from a local authority or state highway network–restricted discretionary activity.</li> <li>Rule WH.R10: Stormwater from new state highways– discretionary activity.</li> </ul>	New New New New New	Select stance	Part 1 Schedule 1		
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<ul> <li>coastal water – permitted activity.</li> <li>Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.</li> <li>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.</li> <li>Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.</li> <li>Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.</li> <li>Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity.</li> <li>Rule WH.R9: Stormwater from a local authority or state highway network–restricted discretionary activity.</li> <li>Rule WH.R11: Stormwater from new state highways– discretionary activity.</li> </ul>	New New New New New New New New New	Select stance	Part 1 Schedule 1		
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<ul> <li>coastal water – permitted activity.</li> <li>Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.</li> <li>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.</li> <li>Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.</li> <li>Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.</li> <li>Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity.</li> <li>Rule WH.R9: Stormwater from a local authority or state highway network–restricted discretionary activity.</li> <li>Rule WH.R11: Stormwater from new state highways– discretionary activity.</li> </ul>	New New New New New New New New New	Select stance	Part 1 Schedule 1		
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<ul> <li>coastal water – permitted activity.</li> <li>Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity.</li> <li>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity.</li> <li>Rule WH.R6: Stormwater from new greenfield impervious surfaces – controlled activity.</li> <li>Rule WH.R7: Stormwater from new and redeveloped impervious surfaces of existing urbanised areas – controlled activity.</li> <li>Rule WH.R8: Stormwater from a port or airport – restricted discretionary activity.</li> <li>Rule WH.R9: Stormwater from a local authority or state highway network–restricted discretionary activity.</li> <li>Rule WH.R10: Stormwater from new state highways– discretionary activity.</li> <li>Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity.</li> <li>Rule WH.R12: All other stormwater discharges – non-complying activity.</li> <li>Rule WH.R13: Stormwater from new unplanned greenfield development – prohibited activity.</li> </ul>	New	Select stance	Part 1 Schedule 1		
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Örongorongo River catchments.	Ca	ategory B groundwater in the Te Awa					
		-					
Table 8.9: Groundwater allocation amounts Amended Select stance Freshwater for Category B groundwater and Category C		able 8.9: Groundwater allocation amounts or Category B groundwater and Category C	Amended	Select stance	Freshwater		
groundwater in the Whaitua Te Whanganui-							
a-Tara.	a-	-Tara.		Coloct st-	Frachust		
Figure 8.1: Te Awa Kairangi / Hutt River and Amended       Select stance       Freshwater         Upper Hutt groundwater in Tables 8.8 and			Amenaed	Select stance	rresnwater		
8.9.	8.	.9.					
Figure 8.2: Te Awa Kairangi / Hutt River and Amended Select stance Freshwater Lower Hutt groundwater in Tables 8.8 and			Amended	Select stance	Freshwater		
8.9.		-					

Chapter 9 Te Awarua-o-	9.1 Objectives	New		Both	
Porirua Whaitua			Soloct stars-		
	Objective P.O1: The health of Te Awarua-o- Porirua's groundwater, rivers, lakes, natural		Select stance	Part 1 Schedule 1	
	wetlands, estuaries, harbours and coastal				
	marine area is progressively improved and is wai ora by 2100.				
	Objective P.O2: Te Awarua-o-Porirua's groundwater, rivers, lakes and natural	New	Select stance	Freshwater	
	wetlands, and their margins are on a				
	trajectory of measurable improvement towards wai ora.				
	Objective P.O3: The health and wellbeing of	New	Select stance	Part 1 Schedule 1	
	coastal water quality, ecosystems and habitats in Pāuatahanui 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. Table 9.1: Coastal water objectives.	New	Select stance	Part 1 Schedule 1	
		New	Select stance	Part 1 Schedule 1	
	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.				
	Objective P.O5: Groundwater flows and	New	Select stance	Freshwater	
	levels, and water quality, are maintained.	Now	Soloct stanco	Frachwatar	
	water quantity and ecological processes of	New	Select stance	Freshwater	
	rivers are maintained or improved. Table 9.2: Target attribute states for rivers.	New	Select stance	Freshwater	
	9.2 Policies 9.2.1 Ecosystem healtha and water quality	New New		Both Both	
			Colort		
	Policy P.P1: Improvement of aquatic ecosystem health.	New	Select stance	Part 1 Schedule 1	
	Policy P.P2: Management of activities to	New	Select stance	Part 1 Schedule 1	
	achieve target attribute states and coastal water objectives.				 
	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	New	Select stance	Part 1 Schedule 1	
	Unit sediment load reductions required to achieve the visual clarity target attribute				
	state.	Marri		Deth	
	8.2.1 Discharges to waterPolicy P.P5: Localised adverse effects of	New New	Select stance	Both Part 1 Schedule 1	
	point source discharges. 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	Coloct stores	Part 1 Schedule 1	
	Policy P.P9: General stormwater policy to achieve the target attribute states and	New	Select stance	Part 1 Schedule 1	
	coastal water objectives. Policy P.P10: Managing adverse effects of	New	Select stance	Part 1 Schedule 1	
	stormwater discharges.				
	Policy P.P11: Discharges of a contaminant in stormwater from high risk industrial or	New	Select stance	Part 1 Schedule 1	
	trade premises.				
	Policy P.P12: Managing stormwater network discharges through a Stormwater	New	Select stance	Part 1 Schedule 1	
	Management Strategy.	Nou	Calaatataraa	Dort 1 Cabadula 1	
	Policy P.P13: Stormwater discharges from new and redeveloped impervious surfaces.	New	Select stance	Part 1 Schedule 1	
	Policy P.P14: Stormwater contaminant	New	Select stance	Part 1 Schedule 1	
	offsetting for new greenfield development.				
	Policy P.P15: Stormwater discharges from	New	Select stance	Part 1 Schedule 1	
	new unplanned greenfield development.				
	9.2.3 WastewaterPolicy P.P16: General wastewater policy to	New New	Select stance	Both Part 1 Schedule 1	
	achieve target attribute states and coastal water objectives.				
	Policy P.P17: Progressing works to meet	New	Select stance	Freshwater	
	Escherichia coli target attribute states. Policy P.P18: Managing wastewater	New	Select stance	Part 1 Schedule 1	
	network catchment discharges.				
	Policy P.P19: Managing existing wastewater treatment plant discharges.	New	Select stance	Part 1 Schedule 1	
	· · ·	New		Both	
	9.2.4 Rural Land Uses and Earthworks	Martin	11 AT	Freshwater	
	9.2.4 Rural Land Uses and EarthworksPolicy P.P20: Managing diffuse dischargesof nutrients and Escherichia coli from	New	Select stance		
	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.			Freshwator	
	<ul> <li>Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.</li> <li>Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen</li> </ul>	New New	Select stance	Freshwater	
	<ul> <li>Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.</li> <li>Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.</li> </ul>	New	Select stance		
	<ul> <li>Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.</li> <li>Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.</li> <li>Policy P.P22: Achieving reductions in sediment discharges from farming activities</li> </ul>			Freshwater Freshwater	
	<ul> <li>Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.</li> <li>Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.</li> <li>Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.</li> </ul>	New	Select stance		
	<ul> <li>Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.</li> <li>Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.</li> <li>Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.</li> <li>Policy P.P23: Phasing of farm environment plans.</li> </ul>	New New New	Select stance Select stance Select stance	Freshwater Freshwater	
	<ul> <li>Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.</li> <li>Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.</li> <li>Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.</li> <li>Policy P.P23: Phasing of farm environment</li> </ul>	New New	Select stance Select stance	Freshwater	
	<ul> <li>Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.</li> <li>Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.</li> <li>Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.</li> <li>Policy P.P23: Phasing of farm environment plans.</li> <li>Policy P.P24: Managing rural land use change.</li> <li>Policy P.P25: Promoting stream shading.</li> </ul>	New New New New	Select stance Select stance Select stance Select stance Select stance	Freshwater Freshwater Freshwater Freshwater	
	<ul> <li>Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.</li> <li>Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.</li> <li>Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.</li> <li>Policy P.P23: Phasing of farm environment plans.</li> <li>Policy P.P24: Managing rural land use change.</li> </ul>	New New New New	Select stance Select stance Select stance Select stance	Freshwater Freshwater Freshwater	
	<ul> <li>Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.</li> <li>Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.</li> <li>Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.</li> <li>Policy P.P23: Phasing of farm environment plans.</li> <li>Policy P.P24: Managing rural land use change.</li> <li>Policy P.P25: Promoting stream shading.</li> <li>Policy P.P26: Achieving reductions in</li> </ul>	New New New New	Select stance Select stance Select stance Select stance Select stance	Freshwater Freshwater Freshwater Freshwater	

Policy P.P28: Discharge standard for	New	Select stance	Part 1 Schedule 1	
 earthworks sites. Policy P.P29: Winter shut down of	New	Select stance	Part 1 Schedule 1	
 earthworks.				
<b>9.2.5 Water allocation</b> Policy P.P30: Minimum flows and minimum	Amended/New Amended	Select stance	Freshwater Freshwater	
water levels in Te Awarua-o-Porirua Whaitua.				
Policy P.P31: Water takes at minimum flows	New	Select stance	Freshwater	
and minimum water levels. Policy P.P32: Allocation in the Te Awarua-o-	New	Select stance	Freshwater	
 Porirua Whaitua.			Deth	
	New New		Both Both	
Rule P.R1: Point source discharges of specific contaminants – prohibited activity.	New	Select stance	Part 1 Schedule 1	
	NI		Freshwater	
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	New	Select stance	Part 1 Schedule 1	
coastal water – permitted activity.	•			
Rule P.R4: Stormwater from an existing high risk industrial or trade premise – permitted	New	Select stance	Part 1 Schedule 1	
activity. Rule P.R5: Stormwater from new and	New	Select stance	Part 1 Schedule 1	
redeveloped impervious surfaces –	INC W	Select stallce		
 permitted activity. Rule P.R6: Stormwater from new greenfield	New	Select stance	Part 1 Schedule 1	
impervious surfaces – controlled activity.				
Rule P.R7: Stormwater from new and	New	Select stance	Part 1 Schedule 1	
redeveloped impervious surfaces of existing urbanised areas- controlled activity.				
	Na			
Rule P.R8: Stormwater from a local authority or state highway	New	Select stance	Part 1 Schedule 1	
network–restricted discretionary activity. Rule P.R9: Stormwater from new state	New	Select stance	Part 1 Schedule 1	
highways– discretionary activity.				
Rule P.R10: Stormwater from new and redeveloped impervious surfaces—	New	Select stance	Part 1 Schedule 1	
discretionary activity. Rule P.R11: All other stormwater discharges	Νοιν	Select stance	Part 1 Schedule 1	
– non-complying activity.				
Rule P.R12 – Stormwater discharges from new unplanned greenfield development –	New	Select stance	Part 1 Schedule 1	
 prohibited activity.	Now		Dart 1 Schadula 1	
	New New	Select stance	Part 1 Schedule 1 Part 1 Schedule 1	
catchment discharges to water – restricted discretionary activity.				
Rule P.R14: Existing wastewater discharges	New	Select stance	Part 1 Schedule 1	
from a treatment plant to coastal and freshwater – discretionary activity.				
Rule P.R15: All other discharges of	New	Select stance	Part 1 Schedule 1	
 wastewater – non-complying activity.				
<b>9.3.4 Land uses</b> Rule P.R16: Vegetation clearance on highest	New New	Select stance	Freshwater Freshwater	
erosion risk land– permitted activity.				
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	New	Select stance	Freshwater	
activity. Rule P.R20: Plantation forestry –	New	Select stance	Freshwater	
discretionary activity. Rule P.R21: Plantation Forestry on highest	New	Select stance	Freshwater	
erosion risk land – prohibited activity.				
<b>9.3.5 Earthworks</b> Rule P.R22: Earthworks – permitted activity.	New New	Select stance	Both Freshwater	
	New	Select stance	Part 1 Schedule 1	
discretionary activity.				
Rule P.R24: Earthworks – non-complying activity.	New	Select stance	Part 1 Schedule 1	
	New		Freshwater	
Rule P.R25: Farming activities on properties	New	Select stance	Freshwater	
of between 4 hectares and 20 hectares – permitted activity.				
Rule P.R26: Farming activities on 20	New	Select stance	Freshwater	
hectares or more of land – permitted activity.				
Table 9.5: Phase in of farm environment plans for Part Freshwater Management	New	Select stance	Freshwater	
 Units.	Navi		Faceb	
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-	New	Select stance	Freshwater	
complying activity. 9.3.7 Take and use of water	New		Freshwater	
Rule P.R30: Take and use of water –	New	Select stance	Freshwater	
	New	Select stance	Freshwater	
restricted discretionary activity. Rule P.R32: Take and use of water –	New	Select stance	Freshwater	
 discretionary activity.				
exceeds minimum flows or allocation	New	Select stance	Freshwater	
amounts – prohibited activity.	A1.	Select stance		
Table 9.6: Minimum flows for Te Awarua-o-	New	Select Stance	Freshwater	

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

Map 27: Sites with significant indigenous	New	Select stance	Part 1 Schedule 1			
biodiversity values in the coastal marine						
area (Schedule F4).						
Map 27: Sites with significant indigenous	New	Select stance	Part 1 Schedule 1			
biodiversity values in the coastal marine						
area (Schedule F4) Insert 1: (Kāpiti).						
	New	Select stance	Part 1 Schedule 1			
	New	Select stance				
biodiversity values in the coastal marine						
area (Schedule F4) Insert 2: (Wellington						
 Harbour).						
	New	Select stance	Part 1 Schedule 1			
biodiversity values in the coastal marine						
area (Schedule F4) Insert 2: Te Awarua-o-						
Porirua.						
Map 77: Habitats of nationally threatened	New	Select stance	Part 1 Schedule 1			
freshwater species – Te Awarua-o-Porirua						
and Te Whanganui-a-Tara (Schedule F1).						
Map 78: Part freshwater management units	New	Select stance	Freshwater			
and target attribute state sites (rivers) – Te						
Awarua-o-Porirua.						
Map 79: Part freshwater management units	Now	Select stance	Freshwater	1	+	-+
		Select stalle	i i conwalel			
and target attribute state sites (rivers) – Te						
Whanganui-a-Tara.					<u> </u>	
Map 80: Part freshwater management units	New	Select stance	Freshwater			
and target attribute state sites (lakes) – Te						
Whanganui-a-Tara.						
	New	Select stance	Freshwater			
management units for water takes – Te						
Awarua-o-Porirua.						
Map 82: Coastal water management units –	New	Select stance	Part 1 Schedule 1			
Te Awarua-o-Porirua.						
Map 83: Coastal water management units –	New	Select stance	Part 1 Schedule 1			
Te Whanganui-a-Tara.						
Map 84: Harbour arm catchments – Te	New	Select stance	Part 1 Schedule 1			
Awarua-o-Porirua.						
Map 85: Primary contact sites – Te	New	Select stance	Freshwater			
Whanganui-a-Tara.						
 Map 86: Unplanned greenfield areas –	New	Select stance	Part 1 Schedule 1			
Porirua City Council.						
Map 87: Unplanned greenfield areas –	New	Select stance	Part 1 Schedule 1			
	New	Select stance				
Wellington City Council.	New				<u> </u>	—
Map 88: Unplanned greenfield areas –	New	Select stance	Part 1 Schedule 1			
Upper Hutt City Council.						
Map 89: Unplanned greenfield areas – Hutt	New	Select stance	Part 1 Schedule 1			
City Council.						
	New	Select stance	Freshwater			
(Pasture) – Te Awarua-o-Porirua.		ļ			l	
Map 91: Highest erosion risk land (Woody	New	Select stance	Freshwater			
vegetation) – Te Awarua-o-Porirua.						
Map 92: Highest erosion risk land	New	Select stance	Freshwater			7
(Plantation forestry) – Te Awarua-o-Porirua.						
Map 93: Highest and high erosion risk land	New	Select stance	Freshwater			
(Pasture) – Te Whanganui-a-Tara.						
	New	Select stance	Freshwater		1	
vegetationclearance) – Te Whanganui-a-						
Tara.						
Map 95: Highest erosion risk land	New	Select stance	Freshwater		1	-+
(Plantation forestry) – Te Whanganui-a-						
Tara.						
Map 96: Mākara catchment.	New	Select stance	Freshwater			-+
iviap 50. Iviakara catchinent.						
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 gullys 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 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 implmenting new rules.	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.
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 or 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 know for each catchment in order for them to be addressed. Some parts of the wider Mākara Stream catchment, and many streams outside the cathcment, 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.	Lack of consistency with WH.P22 (nitorgen) 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 innappropriate to extrapolate the results of one monitoring site across all of Mākara and Ohariu, given the differences in catchments/sub- catchment.
			Local water quality studies need to be carried out and the option for landowner farm-scale monitoring provided for –

			including feedback loops to montior the
Policy WH.P23 (a) (sediment – identifying high risk land)	Amend	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.	<ul> <li>impact of actions.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>Allow for a much more accurate assessment of <u>risk</u> on individual farms by assessment of sediment sources at the farm-scale.</li> </ul>
Policy WH.P23 (b) (Sediment – Erosion Risk Mgt Plans)	Amend	Refocus from "erosion risk" to "sediment management".	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.
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 indentified through farm-scale assessment, including via the audited Freshwater Farm Plans.	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.
			The "woody vegetation" will likely need to be natural reversion since using poplars and willows (alongside grazing) is unlikely to be succesful 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. This area has unique challenges with revegetation projects, in large part due to

			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. The policy relies on modelling that we believe is innaccurate. It makes no sense to retire farmland where there is no actual erosion issue.
Policy WH.P26 (Livestock access to small rivers)	Amend	Replace "restrict" with "reduce". Amend the policy wording to match the heading about river size.	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 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.
Policy WH.P27 (Promoting stream shading)	Support		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.
Rules			
Rule WH.R27 (Farming activities on 20+ ha)	Amend	Ensure that the details of this rule are consistent with the content and timing for Freshwater Farm Plans	We do not want to double up on farm plan work when an existing process is already in play under national regulation.
Rule WH.R28 and R29 (Access to small river)	Oppose	Remove since this can be instead incorporate into certified/audited Freshwater Farm Plans as catchment context.	Also refer to comments against Policy WH.P26.