

FURTHER
SUBMISSION

Natural Resources Plan Plan Change 1

8 March 2024

To: Wellington Regional Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) made a submission on Proposed Change 1 to the Natural Resources Plan and welcomes any opportunity to continue to work with Greater Wellington Regional Council and to discuss our submission.

The details of HortNZ's further submissions and decisions we are seeking from Council are set out below.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 4,200 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

There are approximately 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.



Further Submission

1. Horticulture New Zealand's (HortNZ) further submissions are contained in the attached table below.
2. HortNZ represents commercial fruit and vegetable growers in the Greater Wellington Region, so represents a relevant aspect of the public interest.
3. HortNZ is not a trade competitor and could not gain any advantage in trade competition through this further submission.
4. HortNZ wishes to be heard in support of its further submissions.
5. If others make similar submissions, HortNZ will consider presenting a joint case with them at the hearing.

Further submission on behalf of HortNZ on Proposed Change 1 to the Natural Resources Plan

Submitter	Sub #	Plan Section	Provision	Stance	Reasons	Decision Requested
Wellington Fish and Game Regional Council	S188.016	General comments	General comments - consultation	Support	A clear engagement process is needed to achieve the requirements of the NPSFM 2020.	HortNZ supports the assertion that Greater Wellington Regional Council has an obligation to follow Section 3.2(2)(b) of the NPSFM 2020, which requires every regional council to engage with communities and tangata whenua to identify long-term visions, environmental outcomes, and other elements of the NOF.
Upper Hutt City Council	S225.006	General comments	General comments - current legislation	Support	GWRC has an obligation to implement the National Policy Statement for Highly Productive Land (NPS-HPL) as soon as practicable. PC1 to the NRP was notified October 2023, well after the NPS-HPL (October 2022). Clause 3.2 (1) (a) of the NPS-HPL requires regional councils to consider "how land-based primary production, including	HortNZ supports the need to amend PC1 to correctly implement national planning standards, including the NPS-HPL.

					supporting activities, interact with freshwater management at a catchment level”.	
Wairarapa Federated Farmers	S193.018	General comments	General comments - fresh water	Support	HortNZ supports the assertion that the involvement of communities, stakeholders and territorial authorities is important in the development of FAPs, in addition to partnership with mana whenua/tangata whenua, and this is recognised in the NPS-FM.	Make any consequential amendment(s) necessary to give effect to the relief sought.
Forest & Bird	S261.008	General comment	General comments - overall	Oppose	HortNZ believes that it is appropriate for GWRC to approve a “recognised nitrogen risk assessment tool” outside of a Schedule 1 process, although we would support criteria for the tool being in the plan.	Disallow.
Forest & Bird	S261.010	General comment	General comments - overall	Oppose	HortNZ contends that a permitted activity status for farming or horticulture with a farm plan is appropriate, particularly to give	Disallow. Do not amend to change permitted activity status for farming activities with a farm plan.

					regard to the NPS-HPL and prioritise land-based primary production, including supporting activities, on highly productive land.	
Wairarapa Federated Farmers	S193.019	General comment	General comments - rural	Support in part	HortNZ supports the use of FWFPs to identify and manage on-farm risk to freshwater contamination in line with national direction.	Replace use of the term “farm environment plan” or FEP throughout the plan with “freshwater farm plan” or FWFP for consistency and to avoid multiple plans being required for a single property. Amend the timing for the nationally mandated FWFPs to be as determined in the national roll-out timeline.
Forest & Bird	S261.004	General comment	General comments - water bodies	Support in part	Values should be clearly identified for each FMU.	Identify the values for each FMU, including a value for Irrigation, cultivation, and production of food and beverages as required by the NPSFM 2020.
Upper Hutt City Council	S225.032	2 Interpretation	Earthworks	Support	It is unreasonable to remove exclusions for business-as-usual horticultural activities.	Reintroduce the exclusions for “the harvesting of crops” and “maintenance of orchards and shelterbelts”.
Wairarapa Federated Farmers	S193.021	2 Interpretation	Earthworks	Support	It is more effective and efficient plan drafting to	Retain operative definition for all whitua or otherwise reintroduce the exclusions for “the harvesting

					have the same definition across all whitua.	of crops" and "maintenance of orchards and shelterbelts".
Forest & Bird	S261.020	2 Interpretation	Recognised Nitrogen Risk Assessment Tool	Oppose	HortNZ believes that it is appropriate for GWRC to approve a "recognised nitrogen risk assessment tool" outside of a Schedule 1 process, although we support inclusion of criteria for the tool in the plan. New tools may be developed, so flexibility is needed to leave room for innovation.	Disallow.
Wairarapa Federated Farmers	S193.029	3 Objectives	Objective O2	Support	Objective O2 is relevant to all whitua and should be retained.	Allow. Retain Objective O2 for all whitua.
Wellington Water Ltd	S151.032	3 Objectives	Objective O5	Support	Objective O5 is relevant to all whitua and should be retained.	Allow. Retain Objective O5 for all whitua.
Wairarapa Federated Farmers	S193.031	3 Objectives	Objective O6	Support	Objective O6 is relevant to all whitua and should be retained.	Allow. Retain Objective O6 for all whitua.
Wairarapa Federated Farmers	S193.033	4 Policies	Policy P70: Minimising effects of rural land use activities.	Support	Policy P70 is relevant to all whitua and should be retained.	Allow. Retain Policy 70 for all whitua.

Wairarapa Federated Farmers	S193.035	4 Policies	Policy P74: Avoiding an increase in adverse effects of rural land use activities and associated diffuse discharges of contaminants.	Support	Policy P74 is relevant to all whitua and should be retained.	Allow. Retain Policy 74 for all whitua.
Wairarapa Federated Farmers	S193.036	4 Policies	Policy P118: Water takes at minimum flows and minimum water levels.	Support	Policy P118 is relevant to all whitua and should be retained. In particular, (d) (iii) is essential to provide for rootstock survival water.	Allow. Retain Policy 118 for all whitua, particularly (d) (iii).
Wellington Water Ltd	S151.046	5.1 Air quality rules	Rule R35: Water and wastewater processes – permitted activity.	Oppose	This rule does not need to be more specific.	Retain reference to “water”. Do not amend to “drinking water processes”.
New Zealand Agrichemical Education Trust (NZAET)	S227.004	5.1 Air quality rules	5.1.14 Discharge of agrichemicals	Support	This is an appropriate amendment.	Allow replacement of 5.1.13 (e) with "the discharge shall be undertaken in accordance with the good practice requirements set out in NZS 8409:2021 Section 5.2.".
New Zealand Agrichemical Education Trust (NZAET)	S227.001	5.1 Air quality rules	5.1.14 Discharge of agrichemicals	Support	Non-hazardous substances are already regulated under the HSNO Act and EPA and	Allow. Delete "(d) the agrchemical is approved by the Environmental Protection Agency"

					do not require further regional rules.	
Wairarapa Federated Farmers	S193.039	5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks – permitted activity.	Support	Rule R101 is relevant to all whitua and should be retained.	Allow. Retain Rule R101 for all whitua.
Wairarapa Federated Farmers	S193.040	5.2 and 5.3 Discharges to land and water and land use rules	Rule R102: Construction of a new farm track – permitted activity.	Support	Rule R102 is relevant to all whitua and should be retained.	Allow. Retain Rule R102 for all whitua.
Wairarapa Federated Farmers	S193.041	5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track – controlled activity.	Support	Rule R103 is relevant to all whitua and should be retained.	Allow. Retain Rule R103 for all whitua.
Wairarapa Federated Farmers	S176.004	6 Other methods	Method M36: Freshwater Action Plan programme.	Support in part	This amendment allows for closer alignment with Section 3.15 of the NPS-FM.	Amend Method 36 (a) as follows: developed in partnership with mana whenua, and be informed by through engagement with catchment communities, territorial authorities and stakeholders...

Upper Hutt City Council	S225.051	6 Other methods	Method M36: Freshwater Action Plan programme.	Support	HortNZ agrees that consideration should be given to incoming government direction on freshwater.	Amend timeframes as required to align with new government direction on freshwater.
Upper Hutt City Council	S225.055	6 Other methods	Method M42: Small farm property registration within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	This is an onerous requirement for small properties.	Delete this method.
Wairarapa Federated Farmers	S193.054	6 Other methods	Method M44: Supporting the health of rural waterbodies.	Support	An integrated management approach is needed to target mitigations to make the specific improvements needed based on the state of the overall catchment.	Make any consequential amendment(s) necessary to give effect to the relief sought. Direct Council assistance with appropriate on-farm mitigations for 100% of farms in rural catchments by x date, eg, 2030. Also direct Council to invest in catchment-scale mitigation options.
Wairarapa Federated Farmers	S193.056	8 Whaitua Te Whanganui-a-Tara	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively	Support	Amend to provide for the value for Irrigation, cultivation, and production of food and beverages in the NPS-FM.	Amend WH.O1 to add the following clause, " Primary production activities thrive with water quality and quantity suitable for irrigation needs. "

			improved and is wai ora by 2100.			
Tama Potaka, Minister of Conservation	S245.001	8 Whaitua Te Whanganui-a-Tara	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.	Support	This objective will be more achievable with the submitter's amendment.	Allow, amend bullet point two from: "All freshwater bodies have planted margins" to " All freshwater bodies have vegetated margins where practicable. "
Wairarapa Federated Farmers	S193.057	8 Whaitua Te Whanganui-a-Tara	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.	Support in part	Water bodies above the national bottom lines could be deemed by the community to be sufficiently healthy to meet the requirements of the NPSFM given the other hierarchies of obligation under Te Mana o te Wai.	Amend (a) water quality, habitats, water quantity and ecological processes are at a level where the state of aquatic life is maintained, or meaningful progress has been made towards improvement where below the target attribute state degraded , and... Add clause (i) to provide for reliable water to support a thriving primary production sector.
Wairarapa Federated Farmers	S193.059	8 Whaitua Te Whanganui-a-Tara	Table 8.1: Coastal water objectives	Support	Amend to be consistent with the NPS-FM. The units for muddiness are unclear, and sedimentation rate	Add column for measured baseline state. Amend units for muddiness. Amend unit for Sedimentation rate to Current:Baseline.

					should have the unit Current: Baseline.	
Wairarapa Federated Farmers	S193.061	8 Whaitua Te Whanganui-a-Tara	Objective WH.O5 By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	Support in part	We question whether wai ora is only achieved by the A band when the lakes are already above the national bottom lines and therefore could be deemed by the community to be sufficiently healthy to meet the requirements of the NPSFM given the other hierarchies of obligation under Te Mana o te Wai.	Amend WH.O5 as follows: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards a natural reference state wai ora , such that: (a) water quality, habitats, water quantity and ecological processes are at a level where the state of aquatic life is maintained, or meaningfully improved where below the target attribute state degraded , to achieve the target attribute states in Table 8.2, and...
Wairarapa Federated Farmers	S193.063	8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Support	Water quality is also important for irrigation of fruits and vegetables to meet food safety standards.	Amend WH.O6 (d) as follows, "ensure that groundwater is of sufficient quality and reliability for irrigation and human and stock drinking water, and..."
Forest & Bird	S261.060	8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Oppose	It is unclear whether those areas not in natural bush can realistically meet a natural state.	Disallow amendment to WH.O9 and associated table. Amend WH.O9 as follows: (a) where a target attribute state in Table 8.4 is not met, the state of that attribute is improved in a

						rivers and river reaches in the part Freshwater Management Unit
Wellington Water Ltd	S151.064	8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers	Support in part	For Ōrongorongo, Te Awa Kairangi and Wainuiomata small forested and Te Awa Kairangi forested mainstems, it is not clear whether A band can be achieved for macroinvertebrates and sediment if there is plantation forestry in that catchment. This line of reasoning applies to each river catchment where improvement are sought which are greater than maintaining the baseline state.	<p>Either leave TAS at A and make change to WH.O9 to remove requirement for every river and every reach or make TAS achievable given activities that occur near every river and every reach. This applies to each catchment.</p> <p>Provide further information on the baseline state and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis.</p>
Forest & Bird	S261.063	8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Prohibiting land use intensification may inadvertently prohibit vegetable crop rotation, in which land use rotates through pastoral and vegetable cropping phases for soil health and biosecurity management. Prohibiting changes in land use from pastoral to horticulture would be an	Disallow. Amend (a) as follows: prohibiting unplanned urban greenfield development and for other urban greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and

					adverse outcome for regional food security and emissions reduction.	
PF Olsen Ltd	S18.023	8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Comprehensive and representative decision-making requires partnership with mana whenua, the local community and primary industry.	Allow, amend as follows: "The Wellington Regional Council shall, in partnership with mana whenua, the local community and primary industry , prepare and deliver Freshwater Action Plans..."
Upper Hutt City Council	S225.072	8 Whaitua Te Whanganui-a-Tara	Policy WH.P7: Discharges to groundwater.	Support	HortNZ shares concerns that this policy is not specific about which discharges are addressed.	Allow. Amend to clarify which discharges this policy attempts to manage.
Wairarapa Federated Farmers	S193.079	8 Whaitua Te Whanganui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Support	Amend for clarity	Amend WH.P15 as follows: ...new urban greenfield development...
Wairarapa Federated Farmers	S193.080	8 Whaitua Te Whanganui-a-Tara	Policy WH.P16: Stormwater discharges from new unplanned greenfield development.	Support	Amend for clarity	Amend WH.P16 as follows: Avoid all new stormwater discharges from urban unplanned greenfield development...

Upper Hutt City Council	S225.083	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Support	The method of capping nitrogen discharges from individual properties is not supported. Capping discharges on every property is not a targeted approach and may adversely affect local fruit and vegetable production, which is of great importance to the local community and beneficial for regional food security.	Amend WH.P21 (a) as follows, " capping , minimising and reducing diffuse discharges from individual rural properties in accordance with WH.P22, WH.P23 and WH.P24..." Delete WH.P21 (a).
Taranaki Whānui	S286.052	8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Support	HortNZ supports integrated catchment management, where mitigations are targeted to the most effective places to reduce the worst contaminants, not a blanket approach to capping discharges.	Delete WH.P21 (a).
Environmental Deference Society Inc.	S222.043	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Oppose	The Resource Management (Freshwater Farm Plans) Regulations 2023 only require freshwater farm plans for horticultural land use on 5 ha or more of land. Requiring farm environment plans for	Disallow

					smaller properties would be out of step with national direction.	
Forest & Bird	S261.083	8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Oppose in part	HortNZ agrees that the effects of cumulative discharges should be evaluated at the FMU or sub-catchment scale. The answer is not to restrict individual smaller, non-intensive horticultural land uses but instead to determine targeted mitigations based on catchment-wide contaminants.	Do not amend to require reductions in discharges from smaller land parcels.
Wairarapa Federated Farmers	S193.084	8 Whaitua Te Whanganui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Support	Timelines for farm plans are already managed by national regulation.	Allow. Delete WH.P24.
Upper Hutt City Council	S225.087	8 Whaitua Te Whanganui-a-Tara	Policy WH.P25: Managing rural land use change.	Support	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.	Delete this policy and associated provisions.
PF Olsen Ltd	S18.027	8 Whaitua Te	Policy WH.P25: Managing rural land use change.	Support	This policy is overly onerous and could prevent crop rotation, an essential practice for soil	Delete provision. Review any remaining policies related to rural land use change with the

		Whanganui-a-Tara			health and preventing pests and disease.	considerations listed by the submitter.
Forest & Bird	S261.090	8 Whaitua Te Whanganui-a-Tara	Policy WH.P29: Management of earthworks.	Oppose	Setbacks are managed through district plans.	Disallow.
Hutt City Council	S211.017	8 Whaitua Te Whanganui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Support	Winter shutdown of ancillary rural earthworks would shut down normal agricultural and horticultural practice. Exclude these activities directly or delete the policy.	<p>Delete policy or amend Policy WH.P31 to exclude ancillary rural earthworks and introduce the following definition for ancillary rural earthworks:</p> <p>“Earthworks associated with normal agricultural and horticultural practices, such as:</p> <ul style="list-style-type: none"> • Maintenance and construction of facilities, devices and structures typically associated with farming activities including but not limited to farm tracks, driveways and unsealed parking areas, stock races, silage pits, farm drains, farm effluent ponds, and feeding lots, fencing, crop protection and sediment control measures

						<ul style="list-style-type: none"> • Irrigation and land drainage • The burying of material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993."
Forest & Bird	S261.110	8 Whaitua Te Whanganui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Oppose	Setbacks are managed through district plans. Pest plants may need to be removed for biosecurity purposes.	Do not introduce additional standards. Amend Rule WH.R17 (a) as follows: (a) (ii) for the control of pest plants, and or (iii) to remove material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993, and
Greater Wellington Regional Council	S238.018	8 Whaitua Te Whanganui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Support	Ancillary rural earthworks should be a permitted activity.	Delete (a) and (b) such that Rule WH.R23 applies to all earthworks, including ancillary rural earthworks.

Greater Wellington Regional Council	S238.019	8 Whaitua Te Whanganui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Support in part	Rules should relate to the effective area used rather than parcel size.	Amend Rule WH.R26 as follows: "Farming activities on a property of between 4 and 20 hectares of land - permitted activity The use of land on a property of 4 hectares or more and less than 20 hectares for..."
Greater Wellington Regional Council	S238.020	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	The Resource Management (Freshwater Farm Plans) Regulations 2023 call for an 18-month transition period from when freshwater farm plans are phased in for the region to when they must be submitted to a certifier. It is then the obligation of the certifier to send the certification to the council.	Disallow. Amend as follows: a farm environment plan in respect of the land and associated land use is supplied to a farm environment plan certifier Wellington Regional Council by within 18 months after the date set out in Table 8.6 for the part Freshwater Management Unit in which the farm is located, and... (c) a farm environment plan certifier certifies in writing that: (i) the farm environment plan supplied to the Wellington Regional Council has been prepared in accordance with, and meets the requirements of Schedule Z (farm environment plan) and the Resource Management (Freshwater Farm Plans) Regulations 2023, Schedule 36 (farm environment plan - additional); or

						(ii) where the farm environment plan is certified under section 217G of Part 9A of the RMA, that the farm environment plan meets the requirements of condition (b), and...
Terawhiti Farming Co Ltd	S224.015	8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Support	This farm plan requirement should not create any duplication with Freshwater Farm Plans.	Allow.
Forest & Bird	S261.125	Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Oppose	This rule will make crop rotation near impossible, an essential practice for soil health and managing pests and diseases. Making the rule more restrictive will essentially prohibit crop rotation and land use change to horticulture, a low emissions land use.	Disallow.
Wairarapa Federated Farmers	S193.109	8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Support	This rule as notified would make crop rotation impossible, which is an essential horticultural management practice for soil health and reducing disease pressure.	Delete WH.R31.

Wairarapa Federated Farmers	S193.111	8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a Tara – restricted discretionary activity.	Oppose	HortNZ supports restricted discretionary activity status to retain efficient use as a matter of discretion.	Retain restricted discretionary activity status and retain matter of discretion 1. The reasonable and efficient use of water.
Wairarapa Federated Farmers	S193.112	8 Whaitua Te Whanganui-a-Tara	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.	Support	Amend to provide for the value for Irrigation, cultivation, and production of food and beverages in the NPS-FM.	Amend P.O1 to add the following clause, “Primary production activities thrive with water quality and quantity suitable for irrigation needs.”
Wairarapa Federated Farmers	S193.115	9 Te Awarua-o-Porirua Whaitua	Table 9.1: Coastal water objectives.	Support	Numeric baselines are needed to introduce targets.	Add column showing baseline state.
Forest & Bird	S261.060	9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Oppose	It is unclear whether those areas not in natural bush can realistically meet a natural state.	Disallow amendment to P.O6 and associated table. Amend P.O6 as follows: (a) where a target attribute state in Table 9.2 is not met, the state of that attribute is improved in all rivers and river reaches in the part Freshwater Management Unit...

Forest & Bird	S261.142	9 Te Awarua-o-Porirua Whaitua	Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives.	Oppose	Prohibiting land use intensification may inadvertently prohibit vegetable crop rotation, in which land use rotates through pastoral and vegetable cropping phases for soil health and biosecurity management. Prohibiting changes in land use from pastoral to horticulture would be an adverse outcome for regional food security and emissions reduction.	Disallow Amend (a) as follows: prohibiting unplanned urban greenfield development and for other urban greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and
PF Olsen Ltd	S18.047	9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Comprehensive and representative decision-making requires partnership with mana whenua, the local community and primary industry.	Allow, amend as follows: "The Wellington Regional Council shall, in partnership with mana whenua, the local community and primary industry , prepare and deliver Freshwater Action Plans..."
Winstone Aggregates	S206.066	9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Support	HortNZ shares concerns that this policy is not clear or measurable.	Allow proposed amendment and clarify which discharges this policy attempts to manage.
Porirua City Council	S240.051	9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli	Support	The method of capping nitrogen discharges from individual properties is not supported. Capping discharges on every	Delete Policy P.P20 or Amend WH.P21 (a) as follows, " capping , minimising and reducing diffuse discharges from individual rural

			from farming activities.		property is not a targeted approach and may adversely affect local fruit and vegetable production, which is of great importance to the local community and beneficial for regional food security. HortNZ agrees that this policy unnecessarily cross references other policies.	properties in accordance with WH.P22, WH.P23 and WH.P24..."
Willowbank Trustee Limited	S204.005	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Support	It is unclear what is meant by poor management practices in contrast to good management practices, which are defined in the plan.	Allow, amend Policy P.P21(c)(ii) by deleting words "and by the phasing out of any poor management practices"
Environmental Deference Society Inc.	S222.087	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities	Oppose	The Resource Management (Freshwater Farm Plans) Regulations 2023 only require freshwater farm plans for horticultural land use on 5 ha or more of land. Requiring farm environment plans for smaller properties would be out of step with national direction.	Disallow

Forest & Bird	S261.163	9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities	Oppose in part	HortNZ agrees that the effects of cumulative discharges should be evaluated at the FMU or sub-catchment scale. The answer is not to restrict individual smaller, non-intensive horticultural land uses but instead to determine targeted mitigations based on catchment-wide contaminants.	Do not amend to require reductions in discharges from smaller land parcels.
Wairarapa Federated Farmers	S193.134	9 Te Awarua-o-Porirua Whaitua	Policy P.P23: Phasing of farm environment plans.	Support	Timelines for farm plans are already managed by national regulation.	Allow. Delete P.P23.
PF Olsen Ltd	S18.053	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Support	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.	Delete provision. Review any remaining policies related to rural land use change with the considerations listed by the submitter.
Wairarapa Federated Farmers	S193.135	9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Support	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.	Delete Policy P.P24.

Forest & Bird	S261.169	9 Te Awaruao-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Oppose	Setbacks are managed through district plans.	Disallow.
Porirua City Council	S240.060	9 Te Awaruao-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Support	Winter shutdown of ancillary rural earthworks would shut down normal agricultural and horticultural practice. Exclude these activities directly or delete the policy.	<p>Delete policy or amend Policy WH.P31 to exclude ancillary rural earthworks and introduce the following definition for ancillary rural earthworks:</p> <p>“Earthworks associated with normal agricultural and horticultural practices, such as:</p> <ul style="list-style-type: none"> • Maintenance and construction of facilities, devices and structures typically associated with farming activities including but not limited to farm tracks, driveways and unsealed parking areas, stock races, silage pits, farm drains, farm effluent ponds, and feeding lots, fencing, crop protection and sediment control measures • Irrigation and land drainage

						<ul style="list-style-type: none"> The burying of material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993.”
Forest & Bird	S261.187	9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land- permitted activity.	Oppose	Setbacks are managed through district plans. Pest plants may need to be removed for biosecurity purposes.	Do not introduce additional standards. Amend Rule WH.R17 (a) as follows: (a) (ii) for the control of pest plants, and or (iii) to remove material infected by unwanted organisms as declared by the Ministry of Primary Industries Chief Technical Officer or an emergency declared by the Minister under the Biosecurity Act 1993, and
Greater Wellington Regional Council	S238.030	9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Support	Ancillary rural earthworks should be a permitted activity.	Delete (a) and (b) such that Rule WH.R23 applies to all earthworks, including ancillary rural earthworks.
Greater Wellington	S238.031	9 Te Awarua-o-	Rule P.R25: Farming activities on properties of	Support in part	Rules should relate to the effective area used rather than parcel size.	Amend Rule P.R25 as follows:

Regional Council		Porirua Whaitua	between 4 hectares and 20 hectares - permitted activity.			<p>“Farming activities on a property of between 4 and 20 hectares of land - permitted activity</p> <p>The use of land on a property of 4 hectares or more and less than 20 hectares for...”</p>
Greater Wellington Regional Council	S238.032	9 Te Awaruao-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares or more of land - permitted activity.	Oppose	<p>The Resource Management (Freshwater Farm Plans) Regulations 2023 call for an 18-month transition period from when freshwater farm plans are phased in for the region to when they must be submitted to a certifier. It is then the obligation of the certifier to send the certification to the council.</p>	<p>Disallow. Amend as follows: a farm environment plan in respect of the land and associated land use is supplied to a farm environment plan certifier Wellington Regional Council by within 18 months after the date set out in Table 8.6 for the part Freshwater Management Unit in which the farm is located, and...</p> <p>(c) a farm environment plan certifier certifies in writing that:</p> <p>(i) the farm environment plan supplied to the Wellington Regional Council has been prepared in accordance with, and meets the requirements of Schedule Z (farm environmentplan) and the Resource Management (Freshwater Farm Plans) Regulations 2023, Schedule 36 (farm environment plan- additional);</p> <p>or</p>

						(ii) where the farm environment plan is certified under section 217G of Part 9A of the RMA, that the farm environment plan meets the requirements of condition (b), and...
Forest & Bird	S261.200	9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Oppose	This rule will make crop rotation near impossible, an essential practice for soil health and managing pests and diseases. Making the rule more restrictive will essentially prohibit crop rotation and land use change to horticulture, a low emissions land use.	Disallow.
Wairarapa Federated Farmers	S193.156	9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Support	This rule as notified would make crop rotation impossible, which is an essential horticultural management practice for soil health and reducing disease pressure.	Delete P.R28
Wairarapa Federated Farmers	S193.164	12 Schedules	B1. Principles	Support in part	Amend for improved consistency with NPS-FM	Amend as follows: Freshwater Action Plans will: 1. be prepared in partnership with mana whenua and the community , and...

Wairarapa Federated Farmers	S193.184	12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	This is unnecessary duplication of national freshwater farm plan requirements.	Delete Schedule 36.
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