

Natural Resources Plan: Chapter	Natural Resources Plan: Provision	Original Submitter Name, and Number	Submission point Number	Stance*	Decision Sought *	Decision Sought "The decision I would like the Council to make on this submission point is..."	Reason for feedback:
Filter original submission point by the chapter location	Filter original submission point by specific provision title	Filter by the original submitter Name and associated Submitter Number	Unique identifying number allocated to each specific submission point	Support Oppose Support in part Oppose in part Not stated	Allow Disallow Allow in part Disallow in part	Illustrate which aspects of this original submission that you support or oppose.  Please identify which part(s) (if not the whole submission point) of the original submission point that this further submission is in reference to.	Please provide a summary of the reasons why you support or oppose this original submission to help us understand your position.
General comments	General comments - consultation	Wellington Fish and Game Regional Council, S188	S188.016	Support	Allow	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.	A clear engagement process is needed to achieve the requirements of the NPSFM 2020.
General comments	General comments - current legislation	Upper Hutt City Council, S225	S225.006	Support	Allow	HortNZ supports the need to amend PC1 to correctly implement national planning standards, including the NPS-HPL.	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 supporting activities, interact with freshwater management at a catchment level".

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General comments	General comments - fresh water	Wairarapa Federated Farmers, S193	S193.018	Support	Allow in part	Make any consequential amendment(s) necessary to give effect to the relief sought.	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.
General comment	General comments - overall	Forest & Bird, S261	S261.008	Oppose	Disallow	Disallow.	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.
General comment	General comments - overall	Forest & Bird, S261	S261.010	Oppose	Disallow	Disallow. Do not amend to change permitted activity status for farming activities with a farm plan.	HortNZ contends that a permitted activity status for farming or horticulture with a farm plan is appropriate, particularly to give regard to the NPS-HPL and prioritise land-based primary production, including supporting activities, on highly productive land.
General comment	General comments - rural	Wairarapa Federated Farmers, S193	S193.019	Support in part	Allow in part	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.	HortNZ supports the use of FWFPs to identify and manage on-farm risk to freshwater contamination in line with national direction.

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General comment	General comments - water bodies	Forest & Bird, S261	S261.004	Support in part	Allow in part	Identify the values for each FMU, including a value for Irrigation, cultivation, and production of food and beverages as required by the NPSFM 2020.	Values should be clearly identified for each FMU.
2 Interpretation	Earthworks	Upper Hutt City Council, S225	S225.032	Support	Allow	Reintroduce the exclusions for "the harvesting of crops" and "maintenance of orchards and shelterbelts".	It is unreasonable to remove exclusions for business-as-usual horticultural activities.
2 Interpretation	Earthworks	Wairarapa Federated Farmers, S193	S193.021	Support	Allow	Retain operative definition for all whitua or otherwise reintroduce the exclusions for "the harvesting of crops" and "maintenance of orchards and shelterbelts".	It is more effective and efficient plan drafting to have the same definition across all whitua.
2 Interpretation	Recognised Nitrogen Risk Assessment Tool	Forest & Bird, S261	S261.020	Oppose	Disallow	Disallow.	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.
3 Objectives	Objective O2	Wairarapa Federated Farmers, S193	S193.029	Support	Allow	Allow. Retain Objective O2 for all whitua.	Objective O2 is relevant to all whitua and should be retained.
3 Objectives	Objective O5	Wellington Water Ltd, S151	S151.032	Support	Allow	Allow. Retain Objective O5 for all whitua.	Objective O5 is relevant to all whitua and should be retained.
3 Objectives	Objective O6	Wairarapa Federated Farmers, S193	S193.031	Support	Allow	Allow. Retain Objective O6 for all whitua.	Objective O6 is relevant to all whitua and should be retained.

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4 Policies	Policy P70: Minimising effects of rural land use activities.	Wairarapa Federated Farmers, S193	S193.033	Support	Allow	Allow. Retain Policy 70 for all whitua.	Policy P70 is relevant to all whitua and should be retained.
4 Policies	Policy P74: Avoiding an increase in adverse effects of rural land use activities and associated diffuse discharges of contaminants.	Wairarapa Federated Farmers, S193	S193.035	Support	Allow	Allow. Retain Policy 74 for all whitua.	Policy P74 is relevant to all whitua and should be retained.
4 Policies	Policy P118: Water takes at minimum flows and minimum water levels.	Wairarapa Federated Farmers, S193	S193.036	Support	Allow	Allow. Retain Policy 118 for all whitua, particularly (d) (iii).	Policy P118 is relevant to all whitua and should be retained. In particular, (d) (iii) is essential to provide for rootstock survival water.
5.1 Air quality rules	Rule R35: Water and wastewater processes - permitted activity.	Wellington Water Ltd, S151	S151.046	Oppose	Disallow	Retain reference to "water". Do not amend to "drinking water processes".	This rule does not need to be more specific.
5.1 Air quality rules	5.1.14 Discharge of agrichemicals	New Zealand Agrichemical Education Trust (NZAET), S227	S227.004	Support	Allow	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.".	This is an appropriate amendment.

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5.1 Air quality rules	5.1.14 Discharge of agrichemicals	New Zealand Agrichemical Education Trust (NZAET), S227	S227.001	Support	Allow	Allow. Delete "(d) the <b>agr</b> ichemical is approved by the Environmental Protection Agency"	Non-hazardous substances are already regulated under the HSNO Act and EPA and do not require further regional rules.
5.2 and 5.3 Discharges to land and water and land use rules	Rule R101: Earthworks - permitted activity.	Wairarapa Federated Farmers, S193	S193.039	Support	Allow	Allow. Retain Rule R101 for all whitua.	Rule R101 is relevant to all whitua and should be retained.
5.2 and 5.3 Discharges to land and water and land use rules	Rule R102: Construction of a new farm track - permitted activity.	Wairarapa Federated Farmers, S193	S193.040	Support	Allow	Allow. Retain Rule R102 for all whitua.	Rule R102 is relevant to all whitua and should be retained.
5.2 and 5.3 Discharges to land and water and land use rules	Rule R103: Construction of a new farm track - controlled activity.	Wairarapa Federated Farmers, S193	S193.041	Support	Allow	Allow. Retain Rule R103 for all whitua.	Rule R103 is relevant to all whitua and should be retained.
6 Other methods	Method M36: Freshwater Action Plan programme.	Wairarapa Federated Farmers, S193	S176.004	Support in part	Allow in part	Amend Method 36 (a) as follows:  developed in partnership with mana whenua, and <del>be informed by</del> <b>through</b> engagement with <del>catchment</del> communities, territorial authorities and stakeholders...	This amendment allows for closer alignment with Section 3.15 of the NPS-FM.
6 Other methods	Method M42: Small farm property registration within Whitua Te	Upper Hutt City Council, S225	S225.055	Support	Allow in part	Delete this method.	This is an onerous requirement for small properties.

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	Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.						
6 Other methods	Method M44: Supporting the health of rural waterbodies.	Wairarapa Federated Farmers, S193	S193.054	Support	Allow in part	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.	An integrated management approach is needed to target mitigations to make the specific improvements needed based on the state of the overall catchment.
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.	Wairarapa Federated Farmers, S193	S193.056	Support	Allow in part	Amend WH.O1 to add the following clause, " <b>Primary production activities thrive with water quality and quantity suitable for irrigation needs.</b> "	Amend to provide for the value for Irrigation, cultivation, and production of food and beverages in the NPS-FM.

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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.	Tama Potaka, Minister of Conservation, S245	S245.001	Support	Allow	Allow, amend bullet point two from: "All freshwater bodies have planted margins" to " <b>All freshwater bodies have vegetated margins where practicable.</b> "	This objective will be more achievable with the submitter's amendment.
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.	Wairarapa Federated Farmers, S193	S193.057	Support in part	Allow in part	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 <b>below the target attribute state</b> degraded, and... Add clause (i) to provide for reliable water to support a thriving primary production sector.	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.
8 Whaitua Te Whanganui-a-Tara	Table 8.1: Coastal water objectives	Wairarapa Federated Farmers, S193	S193.059	Support	Allow	Add column for measured baseline state. Amend units for muddiness. Amend unit for	Amend to be consistent with the NPS-FM.

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						Sedimentation rate to Current:Baseline.	The units for muddiness are unclear, and sedimentation rate should have the unit Current: Baseline.
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.	Wairarapa Federated Farmers, S193	S193.061	Support in part	Allow in part	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 <b>natural reference state wai ora</b> , 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 <b>below the target attribute state degraded</b> , to achieve the target attribute states in Table 8.2, and...	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.



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8 Whaitua Te Whanganui-a-Tara	Objective WH.O6: Groundwater flows and levels, and water quality, are maintained.	Wairarapa Federated Farmers, S193	S193.063	Support	Allow in part	Amend WH.O6 (d) as follows, "ensure that groundwater is of sufficient quality <b>and reliability</b> for <b>irrigation and</b> human and stock drinking water, and..."	Water quality is also important for irrigation of fruits and vegetables to meet food safety standards.
8 Whaitua Te Whanganui-a-Tara	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Forest & Bird, S261	S261.060	Oppose	Disallow in part	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 <del>all rivers and river reaches</del> in the part Freshwater Management Unit	It is unclear whether those areas not in natural bush can realistically meet a natural state.
8 Whaitua Te Whanganui-a-Tara	Table 8.4: Target attribute states for rivers	Wellington Water Ltd, S151	S151.064	Support in part	Allow in part	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.  Provide further information on the baseline state and a detailed assessment of the implications of the TAS provisions on a sub-catchment basis.	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.

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8 Whaitua Te Whanganui-a-Tara	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Forest & Bird, S261	S261.063	Oppose	Disallow	Disallow. Amend (a) as follows: prohibiting unplanned <b>urban</b> greenfield development and for other <b>urban</b> greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and	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.
8 Whaitua Te Whanganui-a-Tara	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	PF Olsen Ltd, S18	S18.023	Support	Allow	Allow, amend as follows: "The Wellington Regional Council shall, in partnership with mana whenua, <b>the local community and primary industry</b> , prepare and deliver Freshwater Action Plans..."	Comprehensive and representative decision-making requires partnership with mana whenua, the local community and primary industry.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P7: Discharges to groundwater.	Upper Hutt City Council, S225	S225.072	Support	Allow	Allow. Amend to clarify which discharges this policy attempts to manage.	HortNZ shares concerns that this policy is not specific about which discharges are addressed.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P15: Stormwater contaminant offsetting for new greenfield development.	Wairarapa Federated Farmers, S193	S193.079	Support	Allow	Amend WH.P15 as follows: ...new <b>urban</b> greenfield development...	Amend for clarity
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P16: Stormwater discharges from new	Wairarapa Federated Farmers, S193	S193.080	Support	Allow	Amend WH.P16 as follows: Avoid all new stormwater discharges from <b>urban</b> unplanned greenfield development...	Amend for clarity

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	unplanned greenfield development.						
8 Whaitua Te Whanganui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Upper Hutt City Council, S225	S225.083	Support	Allow in part	Amend WH.P21 (a) as follows, " <del>capping</del> , minimising and reducing diffuse discharges from individual rural properties in accordance with WH.P22, WH.P23 and WH.P24..." Delete WH.P21 (a).	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.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P21: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Taranaki Whānui, S286	S286.052	Support	Allow	Delete WH.P21 (a).	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.
8 Whaitua Te Whanganui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Environmental Defence Society Inc., S222	S222.043	Oppose	Disallow	Disallow.	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.

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8 Whaitua Te Whangan ui-a-Tara	Policy WH.P22: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Forest & Bird, S261	S261.083	Oppose in part	Disallow	Do not amend to require reductions in discharges from smaller land parcels.	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.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P24: Phasing of farm environment plans.	Wairarapa Federated Farmers, S193	S193.084	Support	Allow	Allow. Delete WH.P24.	Timelines for farm plans are already managed by national regulation.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P25: Managing rural land use change.	Upper Hutt City Council, S225	S225.087	Support	Allow	Delete this policy and associated provisions.	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P25: Managing rural land use change.	PF Olsen Ltd, S18	S18.027	Support	Allow	Delete provision. Review any remaining policies related to rural land use change with the considerations listed by the submitter.	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.
8 Whaitua Te Whangan ui-a-Tara	Policy WH.P29: Management of earthworks.	Forest & Bird, S261	S261.090	Oppose	Disallow	Disallow.	Setbacks are managed through district plans.

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8 Whaitua Te Whangan ui-a-Tara	Policy WH.P31: Winter shut down of earthworks.	Hutt City Council, S211	S211.017	Support	Allow	Delete policy or amend Policy WH.P31 to exclude ancillary rural earthworks and introduce the following definition for ancillary rural earthworks: "Earthworks associated with normal agricultural and horticultural practices, such as: <ul style="list-style-type: none"> <li>• 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</li> <li>• Irrigation and land drainage</li> <li>• 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."</li> </ul>	Winter shutdown of ancillary rural earthworks would shut down normal agricultural and horticultural practice. Exclude these activities directly or delete the policy.

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8 Whaitua Te Whangan ui-a-Tara	Rule WH.R17: Vegetation clearance on highest erosion risk land - permitted activity.	Forest & Bird, S261	S261.110	Oppose	Disallow	Do not introduce additional standards. Amend Rule WH.R17 (a) as follows: (a) (ii) for the control of pest plants, and or <b>(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</b>	Setbacks are managed through district plans. Pest plants may need to be removed for biosecurity purposes.
8 Whaitua Te Whangan ui-a-Tara	Rule WH.R23: Earthworks - permitted activity.	Greater Wellington Regional Council, S238	S238.018	Support	Allow	Delete (a) and (b) such that Rule WH.R23 applies to all earthworks, including ancillary rural earthworks.	Ancillary rural earthworks should be a permitted activity.
8 Whaitua Te Whangan ui-a-Tara	Rule WH.R26: Farming activities on a property of between 4 hectares and 20 hectares - permitted activity.	Greater Wellington Regional Council, S238	S238.019	Support in part	Allow in part	Amend Rule WH.R26 as follows: "Farming activities on a <del>property of</del> between 4 and 20 hectares of land - permitted activity The use of land on a <del>property</del> of 4 hectares or more and less than 20 hectares for..."	Rules should relate to the effective area used rather than parcel size.

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8 Whaitua Te Whangan ui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Greater Wellington Regional Council, S238	S238.020	Oppose	Disallow	<p>Disallow. Amend as follows: a farm environment plan in respect of the land and associated land use is supplied to <b>a farm environment plan certifier Wellington Regional Council by within 18 months after</b> 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 <b>the Resource Management (Freshwater Farm Plans) Regulations 2023, Schedule 36</b> (farm environment plan= additional);</p> <p>or</p> <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...</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.

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8 Whaitua Te Whanganui-a-Tara	Rule WH.R27: Farming activities on 20 hectares or more of land - permitted activity.	Terawhiti Farming Co Ltd, S224	S224.015	Support	Allow	Allow.	This farm plan requirement should not create any duplication with Freshwater Farm Plans.
Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Forest & Bird, S261	S261.125	Oppose	Disallow	Disallow.	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.
8 Whaitua Te Whanganui-a-Tara	Rule WH.R31: Change of rural land use - discretionary activity.	Wairarapa Federated Farmers, S193	S193.109	Support	Allow	Delete WH.R31.	This rule as notified would make crop rotation impossible, which is an essential horticultural management practice for soil health and reducing disease pressure.
8 Whaitua Te Whanganui-a-Tara	Rule WH.R33: Take and use of water in the Whaitua Te Whanganui-a-Tara - restricted discretionary activity.	Wairarapa Federated Farmers, S193	S193.111	Oppose	Disallow	Retain restricted discretionary activity status and retain matter of discretion 1. The reasonable and efficient use of water.	HortNZ supports restricted discretionary activity status to retain efficient use as a matter of discretion.



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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.	Wairarapa Federated Farmers, S193	S193.112	Support	Allow in part	Amend P.O1 to add the following clause, " <b>Primary production activities thrive with water quality and quantity suitable for irrigation needs.</b> "	Amend to provide for the value for Irrigation, cultivation, and production of food and beverages in the NPS-FM.
9 Te Awarua-o-Porirua Whaitua	Table 9.1: Coastal water objectives.	Wairarapa Federated Farmers, S193	S193.115	Support	Allow	Add column showing baseline state.	Numeric baselines are needed to introduce targets.
9 Te Awarua-o-Porirua Whaitua	Objective P.O6: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Forest & Bird, S261	S261.060	Oppose	Disallow in part	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 <del>all rivers and river reaches</del> in the part Freshwater Management Unit...	It is unclear whether those areas not in natural bush can realistically meet a natural state.

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9 Te Awarua-o-Porirua Whaitua	Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives.	Forest & Bird, S261	S261.142	Oppose	Disallow	Disallow Amend (a) as follows: prohibiting unplanned <b>urban</b> greenfield development and for other <b>urban</b> greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and	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.
9 Te Awarua-o-Porirua Whaitua	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	PF Olsen Ltd, S18	S18.047	Support	Allow	Allow, amend as follows: "The Wellington Regional Council shall, in partnership with mana whenua, <b>the local community and primary industry</b> , prepare and deliver Freshwater Action Plans..."	Comprehensive and representative decision-making requires partnership with mana whenua, the local community and primary industry.
9 Te Awarua-o-Porirua Whaitua	Policy P.P7 Discharges to groundwater.	Winstone Aggregates, S206	S206.066	Support	Allow	Allow proposed amendment and clarify which discharges this policy attempts to manage.	HortNZ shares concerns that this policy is not clear or measurable.
9 Te Awarua-o-Porirua Whaitua	Policy P.P20: Managing diffuse discharges of nutrients and Escherichia coli from farming activities.	Porirua City Council, S240	S240.051	Support	Allow in part	Delete Policy P.P20 or Amend WH.P21 (a) as follows, " <del>capping</del> , minimising and reducing diffuse discharges <del>from individual rural properties</del> in accordance with WH.P22, WH.P23 and WH.P24..."	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. HortNZ agrees that this policy unnecessarily cross references other policies.

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9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities.	Willowbank Trustee Limited, S204	S204.005	Support	Allow	Allow, amend Policy P.P21(c)(ii) by deleting words " <del>and by the phasing out of any poor management practices</del> "	It is unclear what is meant by poor management practices in contrast to good management practices, which are defined in the plan.
9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities	Environmental Defence Society Inc., S222	S222.087	Oppose	Disallow	Disallow	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.
9 Te Awarua-o-Porirua Whaitua	Policy P.P21: Capping, minimising and reducing diffuse discharges of nitrogen from farming activities	Forest & Bird, S261	S261.163	Oppose in part	Disallow	Do not amend to require reductions in discharges from smaller land parcels.	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.
9 Te Awarua-o-Porirua Whaitua	Policy P.P23: Phasing of farm environment plans.	Wairarapa Federated Farmers, S193	S193.134	Support	Allow	Allow. Delete P.P23.	Timelines for farm plans are already managed by national regulation.
9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	PF Olsen Ltd, S18	S18.053	Support	Allow	Delete provision. Review any remaining policies related to rural land use change with the considerations listed by the submitter.	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.

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9 Te Awarua-o-Porirua Whaitua	Policy P.P24: Managing rural land use change.	Wairarapa Federated Farmers, S193	S193.135	Support	Allow	Delete Policy P.P24.	This policy is overly onerous and could prevent crop rotation, an essential practice for soil health and preventing pests and disease.
9 Te Awarua-o-Porirua Whaitua	Policy P.P27: Management of earthworks sites.	Forest & Bird, S261	S261.169	Oppose	Disallow	Disallow.	Setbacks are managed through district plans.
9 Te Awarua-o-Porirua Whaitua	Policy P.P29: Winter shut down of earthworks.	Porirua City Council, S240	S240.060	Support	Allow in part	Delete policy or amend Policy WH.P31 to exclude ancillary rural earthworks and introduce the following definition for ancillary rural earthworks: "Earthworks associated with normal agricultural and horticultural practices, such as: <ul style="list-style-type: none"> <li>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</li> <li>Irrigation and land drainage</li> <li>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</li> </ul>	Winter shutdown of ancillary rural earthworks would shut down normal agricultural and horticultural practice. Exclude these activities directly or delete the policy.

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						Minister under the Biosecurity Act 1993."	
9 Te Awarua-o-Porirua Whaitua	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Forest & Bird, S261	S261.187	Oppose	Disallow	Do not introduce additional standards. Amend Rule WH.R17 (a) as follows: (a) (ii) for the control of pest plants, and or <b>(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</b>	Setbacks are managed through district plans. Pest plants may need to be removed for biosecurity purposes.
9 Te Awarua-o-Porirua Whaitua	Rule P.R22: Earthworks - permitted activity.	Greater Wellington Regional Council, S238	S238.030	Support	Allow	Delete (a) and (b) such that Rule WH.R23 applies to all earthworks, including ancillary rural earthworks.	Ancillary rural earthworks should be a permitted activity.
9 Te Awarua-o-Porirua Whaitua	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares - permitted activity.	Greater Wellington Regional Council, S238	S238.031	Support in part	Allow in part	Amend Rule P.R25 as follows: "Farming activities on a <del>property</del> of between 4 and 20 hectares of land - permitted activity The use of land on a <del>property</del> of 4 hectares or more and less than 20 hectares for..."	Rules should relate to the effective area used rather than parcel size.
9 Te Awarua-o-Porirua Whaitua	Rule P.R26: Farming activities on 20 hectares or more of land - permitted activity.	Greater Wellington Regional Council, S238	S238.032	Oppose	Disallow	Disallow. Amend as follows: a farm environment plan in respect of the land and associated land use is supplied to <b>a farm environment plan certifier</b> <del>Wellington Regional Council</del> <b>within 18 months after</b> the date set out in Table 8.6 for the part Freshwater	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

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						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 <b>the Resource Management (Freshwater Farm Plans) Regulations 2023, Schedule 36</b> (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...	of the certifier to send the certification to the council.
9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Forest & Bird, S261	S261.200	Oppose	Disallow	Disallow.	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.
9 Te Awarua-o-Porirua Whaitua	Rule P.R28: Change of rural land use - discretionary activity.	Wairarapa Federated Farmers, S193	S193.156	Support	Allow	Delete P.R28	This rule as notified would make crop rotation impossible, which is an essential horticultural management practice for soil health and reducing disease pressure.

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12 Schedules	B1. Principles	Wairarapa Federated Farmers, S193	S193.164	Support in part	Allow in part	Amend as follows: Freshwater Action Plans will: 1. be prepared in partnership with mana whenua <b>and the community</b> , and...	Amend for improved consistency with NPS-FM
12 Schedules	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Wairarapa Federated Farmers, S193	S193.184	Support	Allow	Delete Schedule 36.	This is unnecessary duplication of national freshwater farm plan requirements.