

## APPENDIX 1

### Summary of primary and further submissions of Wellington Fish and Game on the Water Provisions of the Horizons Proposed One Plan

Submitter	Relief Sought	Officers Position	WFG final position
<b>Chapter 6 Water section 6.1.1 Scope</b>			
Fish and Game New Zealand Wellington Region	<p>Scope supported</p> <p>The establishment of water management zones is one of the most enlightening advances this Plan makes. The approach to catchment based management that it signals is logical, relevant, and manageable, the essence of “integrated management” and above all captures the sense of belonging that the respective community’s find important</p>	Support noted	Officers recommendation WTR 6 supported
Water and Environmental Care Assn Inc  X 491 point 1 (support)	Following “The maintenance of existing groundwater quality” insert “and improvement where that is indicated by appropriate research”	Reject	Justification given by the officer under section 4.5.2 is supported
<b>Chapter 6 Water section 6.2 Significant Resource management issues 6-1, 6-2, &amp; 6-3</b>			
Fish and Game New Zealand Wellington Region	Issues 6.1 is supported and we wish for it to be retained	Accepted in Part	Recommendation WTR 13 supported
Fish and Game New Zealand Wellington Region	Issue 6.2, is supported and we wish for it to be retained	Accept	Recommendation WTR 14 supported
Fish and Game New Zealand Wellington Region	Issue 6.3 is supported and we wish for it to be retained	Accept	<p>Recommendation WTR 15 opposed</p> <p>Ammend to read:  <i>The demand for flood and erosion control to protect many types of land use has led to significant modification of the Regions waterbodies ways and their margins. Structures required to be located within the beds of rivers and lakes, including bridges, culverts, water intake and discharge pipes and hydroelectricity structures, also affect the natural character of waterbodies ways and their margins. These types of uses and developments, in conjunction with gravel extraction which while having beneficial effects in terms of</i></p>

			<del>flood mitigation</del> , have modified, and continue to modify the physical characteristics and ecology of may of the Regions waterbodies ways and their margins.
<b>Chapter 6 Water - section 6.3 - Objectives 6-1, 6-2, 6-3, &amp; 6-4</b>			
Fish and Game New Zealand Wellington Region	Objective 6-1 supported and we wish for it to be retained	Support noted	Recommendation WTR 16 opposed. Wellington Fish and Game does not support the inclusion of the words “by 2030” as recommended by the Water officer, in regards to their life supporting capacity and values as identified under schedule Ba
Fish and Game New Zealand Wellington Region	Objective 6-2 supported and we wish for it to be retained	Support noted	Recommendation WTR 17 is supported
Fish and Game New Zealand Wellington Region	Objective 6-3 supported and we wish for it to be retained	Support noted	The inclusion of “enhancement” is supported.
Fish and Game New Zealand Wellington Region	Objective 6-4 is not supported  This objective is having a “bob each way”, does not reflect the preamble in 6.1.5, and is contrary to the tone of the Plan.  Decision sought: That Objective 6-4 be reworded to: “The beds of rivers and lakes will be managed to ensure that: i. Their life supporting capacity and morphological integrity is sustained ii. Infrastructure and flood mitigation purposes are recognised and provided for	Reject	Recommendation WTR 18 is opposed  We ask that the objective be amended to include reference to:  - The maintenance of life supporting capacity - The recognition and maintenance of their ecosystem values; and - The maintenance or enhancement of Natural Character
<b>Chapter 6 Water - section 6.4 Policies 6.4.1 Water Management Zones and Values - Policy 6-1: Water management Zones and values</b>			
Fish and Game New Zealand Wellington Region	The concept of water management zones is supported and the values for trout fishery and trout spawning in table 6.2 are supported and we wish that these be retained	Support noted	Recommendation WTR 23 is supported
<b>Chapter 6 Water - section 6.4 Policies 6.4.2 Water Quality - 6.4.2.1 Surface Water Quality - Policies 6-2 to 6-5 inclusive</b>			
Fish and Game New Zealand Wellington Region	Policy 6-2 is supported and we wish it to be retained	Reject	Justification given by the Water Officer is supported? Recommendation WTR 24
Fish and Game New Zealand Wellington Region	Policy 6-3 is supported and we wish it to be retained	Accept	Recommendation WTR 25 supported
Fish and Game New Zealand Wellington Region	Policy 6-4 is supported and we wish it to be retained	Support noted	Recommendation WTR 26 is opposed. The intent of this policy as indicated by its title

			“Enhancement where water quality standards are not met” was designed to ensure that water bodies which had water quality that did not meet relevant water quality standards would be enhanced. The inclusion of the word” maintained” derogates from that intent .
Fish and Game New Zealand Wellington Region	Policy 6-5 is supported and we wish it to be retained	Accept	Recommendation WRT 27 is supported
<b>Chapter 6 Water - section 6.4</b>	<b>Policies 6.4.2 Water Quality - 6.4.2.3 Discharges and Land Use Activities Affecting Water Quality - Policy 6-7, 6-8, 6-9, 6-10, &amp; 6-11</b>		
Fish and Game New Zealand Wellington Region	Policy 6-7 Land use activities affecting surface water quality - is Supported and we wish it to be retained	Accept	Recommendation WTR 29 supported
Fish and Game New Zealand Wellington Region	Policy 6-8 is supported and we wish it to be retained	Accept	Recommendation WTR 30 is supported
Fish and Game New Zealand Wellington Region	Policy 6-9 is supported and we wish it to be retained	Accept	Recommendation WTR 31 is supported
Fish and Game New Zealand Wellington Region	<p>Policy 6-10 is partially supported</p> <p>The criteria proposed within this policy only covers a limited number of circumstances and the cumulative adverse effects of discharges, including non point source discharges needs to be addressed</p> <p>Decision sought:  Add the following criteria (or similar) to this policy, and all other relevant policies, rules and schedules be amended to give affect to the new criteria  (d) managing the respective contributions of non point source and point source discharges to meet the standards  (e) managing the cumulative adverse effect of point source discharge close to one another  (f) managing point source discharges where background levels of contaminants from non point source discharges already breach the standards</p>	Reject	<p>WFG accepts that our concerns regarding this policy have been adequately covered in policy 6-8. Recommendation WRT 32 supported</p> <p>Policy 6-10 Affco NZ seeks to have clause (b) amended as follows (new wording is underlined):  <b>(b) Withholding from discharging contaminants into surface water at times of low flow where that discharge may cause significant adverse effect.</b></p> <p>Policy 6-10 Fish and Game NZ seeks the addition of a number of further criteria covering cumulative adverse effects, contributions of non-point and point source discharges and managing point source discharges where background levels of contaminants from non-point source discharges breach the standards. Policy6-10 covers options or alternatives in terms of discharges to water and land. The matters being raised by Fish and Game are dealt with in other Policies e.g. Policy 6-8.</p>
Fish and Game New Zealand Wellington Region	Policy 6-11 is supported and we wish it to be retained	Accept	Recommendation WRT 33 supported
<b>Chapter 6 Water - section 6.4</b>	<b>Policies 6.4.3 Water Quantity and Allocation – 6.4.3.1 Policies applying to both surface water and groundwater - Policies 6-12, 6-13, &amp; 6-14</b>		

Fish and Game New Zealand Wellington Region	Policy 6-12 is supported and we wish it to be retained	Support noted	Recommendation WRT 34 is opposed Recommended wording changes degrade the intent of this policy from one where efficient use of the resource is given effect to one where those provisions of the RMA are ignored. Wellington Fish and Game supports the wording of policy 6-12 as notified
Fish and Game New Zealand Wellington Region	Policy 6-13 is supported and we wish it to be retained	Support noted	Recommendation WTR 35 is supported.
Fish and Game New Zealand Wellington Region	Policy 6-14 and we wish it to be retained	Support noted	Recommendation WTR 36 is opposed.  The inclusion of “including harvesting during periods of high flow in a water body is unnecessary. WFG does support water harvesting, but care to ensure adequate hydrological variability to maintain the natural character of water bodies and protect their life supporting capacity needs to be considered – as discussed by Dr Fuller and Mr Williams and Associate Professor Death
<b>Chapter 6 Water - section 6.4 Policies 6.4.3 Water Quantity and Allocation – 6.4.3.2 Policies for surface water - Policies 6-15, 6-16, 6-17, 6-18, 6-19, &amp; 6-20</b>			
Fish and Game New Zealand Wellington Region	Policy 6-15 is supported and we wish it to be retained	Support noted	. Recommendation WRT 37 supported
Fish and Game New Zealand Wellington Region	Policy 6-16 is supported and we wish it to be retained	Support noted	Recommendation WTR 38 is supported
Fish and Game New Zealand Wellington Region	Policy 6-17 is supported and we wish it to be retained	Accept	Recommendation WRT 39 supported
Fish and Game New Zealand Wellington Region	Policy 6-18 is supported and we wish it to be retained	Support noted	Recommendation WRT 40 is supported. The importance of maintaining hydrological variability is discussed in the evidence of Dr Fuller and Associate Professor Death.
Fish and Game New Zealand Wellington Region	Policy 6-19 is supported and we wish for it to be retained	Accept	Recommendation WRT 41 is supported
Fish and Game New Zealand Wellington Region	Policy 6-20 is supported and we wish for it to be retained	Accept	Recommendation WRT 42 supported
<b>Chapter 6 Water - section 6.4 Policies 6.4.3 Water Quantity and Allocation – 6.4.3.3 Policies for bores and groundwater - 6.4.3.3 Bores and Groundwater - Policy 6-25</b>			

Fish and Game New Zealand Wellington Region	Policy 6-25 is supported and we wish for it to be retained	Support noted	Recommendation WRT 47 is opposed. Groundwater takes that impact on surface water bodies should have the same regulations including minimum flow restrictions and core allocation limits as surface water takes.
<b>Chapter 6 Water - section 6.4 Policies 6.4.4 River and Lake Beds - Policy 6-27, 6-28, 6-29, 6-30, 6-31, &amp; 6-32</b>			
Fish and Game New Zealand Wellington Region	Policy 6-27 is supported subject to issues raised under “Natural Character”, chapter 7, being satisfactorily resolved	Accept in part	<p>Recommendation WTR 50 opposed</p> <p>Policy 6- 27b</p> <p>In considering matters relating to the preservation, restoration or rehabilitation of the natural character of rivers and their margins particular regard will be given to :</p> <ul style="list-style-type: none"> <li>- the natural ‘style’ and dynamic processes of the river in terms of its natural meander pattern, characteristic bed style and width, quality and quantity of bed habitat and connectivity with its flood plain at the appropriate geomorphological scale (whole river, water management zone, and reach)</li> <li>- the desirability of an integrated approach to flood and erosion hazard management , including the preservation, restoration or rehabilitation of natural character</li> <li>- appropriate science-based research and planning mechanisms (including management plans) to support decision making in these matters.</li> </ul>
Fish and Game New Zealand Wellington Region	Policy 6-28 is supported and we wish for it to be retained	Accept in part	Recommendation WTR 51 opposed. If the inclusion of the term “mitigate” is to be included in this policy then the term “remedy” needs to also be included to give effect to those provisions under the Act (RMA, 1991)
Fish and Game New Zealand Wellington Region	Policy 6-29 is supported	Accept in part	<p>Recommendation WRT 52 opposed</p> <p>Policy 629 and Policy 630 degrade the intent of</p>

			Policy 6-27 and the proposed Policy 6-27b  Policy 6-29 should also refer to the maintenance or enhancement of NC or morphological diversity to protect life supporting capacity
Fish and Game New Zealand Wellington Region	Policy 6-30 is supported	Accept in part	Recommendation WRT 53 supported
Fish and Game New Zealand Wellington Region	Policy 6-31 is supported	Accept	Recommendation WTR 54 is supported
Fish and Game New Zealand Wellington Region	Policy 6-32 is supported and we wish for this to be retained	Reject	Recommendation WTR 55 opposed
<b>Chapter 6 Water - section 6.5</b>	<b>Methods</b>		
Fish and Game New Zealand Wellington Region	The methods are supported	Accept	Officers recommendations supported
<b>Chapter Six: Water - section 6.6</b>	<b>Anticipated Environmental Results</b>		
Fish and Game New Zealand Wellington Region	The specificity of these results is supported  It is noted that Policy 6-27 is not listed within “link to Policy” with respect to the AER relating to “the natural, physical and cultural qualities of the beds...” etc  Decision sought Include Policy 6-27 in this section of the 6.6 AER.	Accept	Officers recommendations are partially supported  The standards should also be referred to under the AER section of the Proposed One Plan to ensure that Horizons monitors the implementation / effectiveness of the Plan against these established standards. In catchments where current water quality does not meet the standards, interim standards and timeframes for meeting them should be established so that Horizons can monitor progress towards the obtainment of the Proposed One Plans Objectives and Policies in reference to maintaining or enhancing surface water quality to protect the identified values of these waterways.  Wellington Fish and Game Council requests that a specific AER is included which addresses the implementation of Issue 63, Policy 6-27 and the proposed Policy 6-27b in regards to the establishment, maintenance or enhancement of Natural Character, in relation to River management

			Schemes. Refer to the evidence of Dr Fuller, Mr Williams, and Associate Professor Death. The integration of consideration of a rivers Natural Character into river management practices / schemes is likely to prove both ecological and economic benefits, and ensure water bodies and their margins are managed sustainably
<b>Chapter Thirteen: Discharges to Land and Water – Policy 13-1, 13-2, 13-3, &amp; 13-4</b>			
Fish and Game New Zealand Wellington Region	The policies are supported and we wish for them to be retained	Accept	Officers recommendation WRT 73, 74, 75, & 76 are supported
<b>Chapter Thirteen: Discharges to Land and Water - 13.2 Rules: Agricultural Activities - Table 13.1 Water management zones</b>			
Fish and Game New Zealand Wellington Region	Table 13-1 is supported and we wish for it to be retained	Accept	Recommendation WTR 78 is supported
<b>Chapter Thirteen: Discharges to Land and Water - 13.2 Rules: Agricultural Activities - Table 13.2 Land Use Capability Nitrogen Leaching/Run off Values</b>			
Fish and Game New Zealand Wellington Region	<p>Opposed</p> <p>The status of this table is confusing. Water management zones or sub zones have been the entity upon which the water quality standards, with respect to nutrients and intensive farming, are based (Policy 6-7: Table 13.1: Schedule D). This table introduces Land Use Classes and sets Nitrogen limits on each of these classes – how is this reconciled against the Objectives, Policies, Table 13.1 and the standards for SIN in Table D17? The obscurity of the relationships between the different values used confuses the link between Objective, Policy, and Standard..... (complete submission discussed in Wellington Fish and Games hearing evidence)</p> <p>Decision sought  Revise Table 13.2 so that the leaching/run off values</p> <ol style="list-style-type: none"> <li>Do not allow an increase over current values</li> <li>Base target values after 5 years on what can be achieved using current best management practices</li> <li>After 15 years, will achieve the SIN standards set in Table D17</li> </ol>	Reject	Recommendation WTR 79 opposed
<b>Chapter Thirteen: Discharges to Land and Water - 13.2 Rules: Agricultural Activities Rule 13-1 Dairy farming, cropping, market gardening, and intensive sheep and beef farming, and associated activities – <i>Controlled</i></b>			
Manawatu Branch of the New Zealand Green Party	Retain Rule 13-1 as is	Accept	The removal of all references to water takes and restrictions are not supported. Recommendation WRT 81 opposed

X 491 3 (Support)			Although Wellington Fish and Game appreciates that water takes and restrictions are covered in other rules, we are of the opinion that rule 13-1 should still refer to those restrictions. The retention of the original wording provides clarity to farmers and ensures that efficient water use and restrictions to protect instream values are included in the FARMS consenting process.
<b>Chapter 15: Takes, Uses and Diversions of Water, and Bores - Policies 15.1 to 15.6</b>			
X 491 Fish and Game New Zealand Wellington Region	Policy 15.1,  Reference to chapter 7 has been omitted from this policy	Accept	Recommendation WRT 112 is opposed. Wellington Fish and Game does not support the exclusion of chapter 7 from this policy. Protection of the Natural Character of waterbodies needs to be taken into consideration when assessing consent applications to take water.
X 491 Fish and Game New Zealand Wellington Region	15.2, 15.3, 15.4, & 15.5 are supported	Accept	Officers recommendations WRT 113, 114, 115, & 116 are supported
X 491 Fish and Game New Zealand Wellington Region	Policy 15.6 is supported provided: a. Policy 6.1 is retained – that is water management zones remain as the management entity b. Policy 15-4 is retained as proposed c. The minimum flows in schedule B are not reduced, and cumulative core allocation limits in schedule B are not increased.	Accept	Recommendation WTR 117 is supported
<b>Chapter 15: Takes, Uses and Diversions of Water, and Bores - 15.2 Rules – Takes and Uses of Water - Rules 15.1 to 15.11</b>			
X 491 Fish and Game New Zealand Wellington Region	Rules 15.1 to 15.4 are supported and we wish for them to be retained	Accept	Recommendations WTR 120, 121, 122, and 123 are supported
X 491 Fish and Game New Zealand Wellington Region	Rule 15.5 Takes and uses of surface water complying with core allocations is supported and we wish for it to be retained	Accept	Recommendation WTR 124 opposed. Wellington Fish and Game does not support the deletion of clause (a) nor the deletion of Rule 15-7.
X 491 Fish and Game New Zealand Wellington Region	Rule 15.6 Takes of surface water not complying with core allocations - is supported and we wish for it to be retained	Accept	Recommendation WTR 125 supported
X 491 Fish and Game New Zealand Wellington Region	Rule 15.7 Takes from rivers protected by water conservation orders - is supported and we wish for it to be retained	Reject	Recommendation WTR 126 opposed
X 491 Fish and Game New Zealand Wellington Region	Rule 15.8 is supported and we wish for it to be retained	Accept	Recommendation WTR 127 supported

Zealand Wellington Region			
X 491 Fish and Game New Zealand Wellington Region	Rule 15-10 New Drainage – Supported	Accept	Recommendation WTR 128 is supported
X 491 Fish and Game New Zealand Wellington Region	<p>Rule 15-11 New Diversions – is supported in part</p> <p>Conditions/Standards/Terms (a) (iv) requires clarification to make it clear it applies to temporary diversions only as, over successive years, trout spawning streams could be ruined. Also, we are concerned about the effects of sediment discharge resulting from such diversions for which we seek redress under Chapter 16, Table 16.1</p> <p>Decision sought Under Rule 15-11, amend Conditions/Standards/Terms (a) (1) by inserting the word temporary” between “a” and “diversion”</p> <p>With respect to Conditions/Standards/Terms (a)(1) and its reference to section 16.2, there is the opportunity for confusion with Rule 16-2: Add, to Conditions/Standards/ Terms (a) (1), after section 16.2., “Table 16.1”</p>	Reject	<p>Recommendation WTR 131 opposed</p> <p>No diversions involving a natural water course</p>
<b>Chapter 16: Structures and the beds of rivers and lakes</b>	<b>Activities involving the Beds of Rivers, Lakes and Artificial Water courses, and Damming</b>	<b>Table 16.1; Standard</b>	<b>Conditions for permitted activities involving</b>
Fish and Game New Zealand Wellington Region	<p>Table 16.1 Standard conditions for permitted activities involving the beds of rivers and lakes – condition (c), (d), and (k) are not supported. These issues will be discussed further in our hearing evidence.</p> <p>There is serious issue of uncertainty in both these conditions. One doesn’t know about the number of days or hours – when an activity was started or how many hour of which day. These are almost impossible conditions to enforce. However it is accepted that the activities this condition is attempting to cover should be occasional and the adverse effects, if not minimal, are at least temporary. We accept in such circumstances moderate to severe discoloration if it is of short duration and carried out at a time that minimises its affect on anglers. That is, one of the adverse effects, other than to Life Supporting Capacity, it the affect of dirty water on angling opportunity. Trout are sight feeders and angling for them is ruined by dirty water. This is particularly relevant at leisure times – during the week after normal working hours and at all times during the weekend and public holidays. The decision we seed will also alleviate concerns we now have over rule 15-11.</p> <p>Decision sought: Delete existing Life Supporting Capacity Condition (c).</p>	Accept in part	<p>Recommendation WTR 138 partially supported</p> <p>Table 16.1 condition (c) and (d) under Life supporting capacity conditions which apply to all water bodies is opposed</p> <ul style="list-style-type: none"> <li>(a) Any discharge of sediment directly caused by the activity shall not be undertaken for more than 5 days and for more than total of 12 hours</li> <li>(b) Any discharge of sediment under (c) shall not, after reasonable mixing, cause any conspicuous change in the colour of water in the receiving water body or any change in horizontal visibility of greater than 20%, more than 4 hours after completion of the activity</li> <li>(k) The activity shall not result in any</li> </ul>

	<p>Add a new Life Supporting Capacity Condition (c) to read:  <i>“Any discharge of sediment shall not, after reasonable mixing*, change the horizontal visibility of the receiving water by more than 30% as measured by black disc, after 12 noon”.</i></p> <p>Add a new Life Supporting Capacity Condition (d) to read:  <i>“Any discharge of sediment under condition (c), shall not occur on weekends or public holidays”.</i></p> <p>Condition (k): this condition conflicts in part with Rule 15-11. Both are activities that are permitted within the bed of a river and both are diversions and 15-11 is subject to all Conditions in table D16.1. There is no reference to 15-11 being permanent or temporary and permanent diversions (straightening or channelling) as permitted by Condition (k) are not acceptable. Over a period of years a spawning stream, for example, could be ruined by straightening 20 to 50m in successive years.</p> <p>Decision sought:  EITHER</p> <p>Reword Condition (k):  <i>“Any straightening or channelling of a river shall be temporary and must not exceed a length equal to two times the width of the river in any 2km length of river in any 12 month period”</i> OR</p> <p>Add to Condition (k)  <i>“This condition does not apply to any trout spawning water as shown in Schedule D”</i></p>		<p>permanent straightening or channelling of a river  Add the Natural Character of the waterbody and its margins shall not be impacted.</p> <p>Wording under “trout spawning” clause (q) supported</p> <p>New wording under “Trout fishery” (x) supported</p>
<b>Chapter 16: Structures and Activities involving the Beds of Rivers, Lakes and Artificial Water courses, and Damming</b>		<b>16.3 Rules – Special Rivers and Lakes - Rule 16-1 &amp; 16-2</b>	
<p>X 161 point 14 &amp; 15 On Track (NZ railways corp)</p> <p>X488 &amp; X491 point 4 &amp; 5, oppose</p>	<p>Rule 16-1 Damming of protected rivers - opposed</p> <p>We consider it appropriate for Council to provide scope to place dams within these rivers where necessary to protect the rail infrastructure. Considering the alignment of the railway it would be impractical and uneconomic to deviate the railway around a waterway protected under rule 16-1</p> <p>In recognition of the significance of these rivers, ONTRACK seeks for Council to amend Rule 16-1. Damming of these rivers where necessary to protect nationally and/or significant infrastructure should be classified as an unrestricted discretionary activity</p>	<p>X 161 points 14 &amp; 15 Reject</p> <p>X 488 &amp; 491 point 4 Accept</p>	<p>Wording changes recommended by WTR 141 opposed</p> <p>Rivers with Water conservation notices, or aesthetic values need to be recognised and protected.</p> <p>I am happy with the prohibited classification of this rule just may have concerns regarding the amended title <i>“Damming of water bodies with a value of Aesthetics listed in Schedule Ba [including water bodies with a National water conservation order”</i>. The rule now says <i>“The erection or placement of a new dam structure pursuant to s13(1) RMA in or on the bed of any water body valued as Aesthetic,</i></p>

			<i>listed in Schedule Ba: and any ancillary damming of water pursuant to s14(1) RMA"</i>
X 330 point 56 (NZ Defence Force)  X 491 point 6 oppose	Rule 16.1 opposed Amend Rule 16-1 by deleting the phrase and the main stems of its tributaries, the Irirangi Stream and the Waiouru Stream from subparagraph c.	X 330 accept in Part  X 491 accept in part	Recommendation WTR 141 opposed
X 358 point 100, 101, 102, 104 (Trust Power Limited)  X 488 point 6, 7, 8, 9, 10, oppose  X 491 point 7, 8, 9, 10,11 oppose	Oppose Rule 16.1 Point 100 Insert a new rule that lists dams that exceed the small dam criteria as discretionary activities. Any similar amendments to like effect. Any consequential amendments that stem from the amendment of Rule 16-1 as proposed in this submission.  Point 101 Insert a new rule that enables lawfully established structures in the beds of lakes and rivers to continue as a permitted activity.  Point 102 Delete Rule 16-1; Any similar amendments to like effect  Point 103 Or amend the prohibited activity status of Rule 16-1 to a restricted discretionary activity and insert matters to which discretion is limited to infrastructure development and energy generation. Appropriate matters could include those relevant matters outlined in Rule 16-9;  Point 104 Restrict Rule 16-1 to those specific parts of waterbodies that are protected by water conservation orders.	X 358 point 100, & 101 accept  X 358 point 102, 103, & 104 reject  X 488 point 6, 7, & 8 reject  X 491 point 7, 8, & 9 reject  X 488 point 9, 10, & X 491 point 10, 11, accept	Recommendation WTR 141 opposed
X 363 point 176 (Meridian Energy Ltd)  X 488 point 12 oppose  X 491 point 13 oppose	Meridian opposes Rule 16-1 and requests the following amendments or similar: Delete Rule 16-1; or Amend so that activities on rivers protected by national water conservation orders are assessed as non complying activities and make all other activities discretionary; and Delete reference to the main stems of its tributaries in clauses (a) to (f). Any consequential amendments necessary to give effect to this submission	X 363 point 176 reject  X 488 point 12 & X 491 point 13 accept	Recommendation WTR 141 opposed
X 426 point 205 (Federated Farmers of NZ INC)  X 488 point 13 oppose X 491 point 14 oppose	Amend Rule 16-1 to only relate to those rivers protected by a Water Conservation Order.	X 426 point 205 rejected  X 488 point 13 & X 491 point 14 accepted	Recommendation WTR 141 opposed
Fish and Game New Zealand Wellington Region	Rule 16-2 Other structures and disturbances in protected rivers - oppose  The Mangatainoka River has been omitted from this Rule and the Hautapu and Makuri only included in part. These changes are necessary for the consistency of treatment of these rivers.	Reject	Recommendation WTR 142 opposed

	<p>Decision sought: Amend Rule 16-2 (e) and (f) to read: <i>(e) the main stem of the Hautapu River above its confluence with the Oraukura Stream and the main stems of its tributaries, the Irirangi Stream and the Waiouru Stream.</i> <i>(f) the main stem of the Makuri River and the main stem of its tributary, the Makuri-iti Stream”.</i></p> <p>Add to Rule 16-2 <i>(g) The main stem of the Mangatainoka river and the main stems of its tributaries, the Makakahi River and its Bruce Stream tributary, the Mangaroa, Mangamaire, Makatukutku and Mangraupiu Stream, and an unnamed tributaory entering the Mangatainoka River at map reference NZMS 260 T25 368-654</i></p>		
X 491 Fish and Game New Zealand Wellington Region	New Rule 16.2a Gravel extraction in protected Rivers - is supported		<p>Opposed</p> <p>Include the Mangatainoka river in relations to gravel extractions in the wet.</p>
<b>Chapter 16: Structures and Activities involving the Beds of Rivers, Lakes and Artificial Water courses, and Damming – Rules 16-5 to 16.7.</b>		<b>16.4 Rules – Use,</b>	<b>Maintenance, Upgrade, Removal and Demolition</b>
X 33 point 4 Fish and Game New Zealand Auckland Waikato region  X 406 Taranaki Fish and Game council	<p>Rule 16.12 The rule governing the maximum size of maimai structures should be amended to allow for maimai up to 10m2</p>	Accept	Recommendation WTR 154 supported
<b>Chapter 16: Structures and Activities involving the Beds of Rivers, Lakes and Artificial Water courses, and Damming – Rules 16-13 to 16-14</b>		<b>16.7 Rules Activities</b>	<b>Within Flood Control and Drainage Schemes</b>
Fish and Game New Zealand Wellington Region	<p><b>Rule 16-13: Activities undertaken by the Regional Council in flood control and drainage schemes – <i>permitted</i></b> - as long as they are undertaken under the ECOP Shall not involve an activity that is:</p> <ul style="list-style-type: none"> <li>- Prohibited under Rule 16-1 – Damming of protected rivers</li> <li>- Regulated under Rule 16-2 – Other structures and disturbances in protected rivers</li> <li>- Regulated under Rule 16-4 – Structures and disturbances in water bodies values as Natural State, SOS Aquatic, and SOS Cultural</li> </ul> <p>It is not clear whether this Rule is intended to apply only to the maintenance of existing structures or lawfully allows the construction of new structures The current code of Practice does not specify any standard(s) for the cumulative effects of</p>	Accept	<p>Support</p> <p>Note previous comments regarding the establishment of standards to assess NC. The Maintenance of NC and where degraded the restoration of NC – changes to policy, methods and AER. Would recommend changing Table 16.1 standard conditions for permitted activities involving the beds of rivers and lakes so that permanent straightening or diversions of rivers is not permitted and so that no discharge of sediment</p>

	<p>the activities contained with the code. Of concern to Fish and Game is the preservation of the natural character within designated River Schemes – specifically the maintenance of important morphological characteristics such as pools, runs, riffles and bars.</p> <p>The code does not address issues of river design where the cumulative adverse effects of diversion and structures, is logically dealt with. Therefore it is paramount, that if the code is to gain our acceptance that there is an over arching standard, in the code, that specifies the number of pools and riffles to be maintained within the gravel bed rivers being managed by the Regional Council</p> <p>Decision sought Add in the code of Practice, under generic Good Practice Standards, a new section:</p> <p><i>“Morphological Characteristics</i></p> <ol style="list-style-type: none"> <li>1. <i>The current number of pools and riffles in the following rivers will be maintained subject to the agreement below:</i> <ul style="list-style-type: none"> <li>- <i>Lower KIWITEA</i></li> <li>- <i>Mangatainoka</i></li> <li>- <i>Ohau</i></li> <li>- <i>Oroua (Pohangina/Oroua Scheme)</i></li> <li>- <i>Pohangina</i></li> <li>- <i>Rnagitikei</i></li> <li>- <i>Upper Manawatu</i></li> <li>- <i>Lower Manawatu</i></li> </ul> </li> </ol> <p><i>It is agreed that:</i></p> <ul style="list-style-type: none"> <li>- <i>This standard will only apply to the gravel bed reaches of the above rivers.</i></li> <li>- <i>The number of pools and riffles to be maintained will be established by counts on each of the above rivers, to be carried out using aerial photography of suitable quality and scale, and will be completed by June 30, 2011. Counts, using the same method, will be repeated on each river every 3 – 5 years. Fish and Game Officers will be invited by the Scheme manager to assist with the counts. In comparing pool counts from different surveys, account will be taken of non river management activities, such as other consented activities and floods</i></li> <li>- <i>Where a decrease in pool count is attributable to river management activities, an immediate informal review of river management practices for the affected reach of that river will be undertaken, in consultation with Fish and Game, with the objective of identifying and implementing changes that will redress the loss of pools and/or riffles.</i></li> </ul> <ol style="list-style-type: none"> <li>2. <i>Any significant shortage of pools and riffles identified in the surveys described in</i></li> </ol>	<p>occurs during weekends or after 5pm week days and does not reduce horizontal visibility by 20% Need to add to Table 16.1 that NC is maintained/not reduced.</p>
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	<p><i>I above will be specifically addressed in the subsequent scheme review process.</i></p> <p><i>It is agreed that:</i></p> <ul style="list-style-type: none"> <li>- <i>The pool/riffle counts obtained from the surveys described above will be expressed for each river in relation to the average channel width for that river</i></li> <li>- <i>A significant shortage for any river will be judged against the ration of the frequency with which a pool occurs to the average width of the bed, averaged across all rivers. For the avoidance of doubt, refer to the following example:</i></li> </ul> <p><i>Length of river managed by the scheme is 20km</i>  <i>The number of pools counted from the aerial photography is 200, which means that there is 1 pool per 100m</i>  <i>The bed width is measured at regular intervals from the aerial photography, producing say, an average bed width for the river of 50m.'</i>  <i>Therefore there is 1 pool every 2 times the average bed width.</i></p> <ul style="list-style-type: none"> <li>- <i>Where a significant shortage is identified, then that will be included as a specific issue to be addressed in the next scheduled engineering review of the scheme concerned</i></li> <li>- <i>The engineering review will consider alternative management practices with the express objective of redressing the shortage and reinstating pools and/or riffles</i></li> <li>- <i>Fish and Game will be identified as a key stakeholder in the review consultation process.</i></li> </ul>		
<p>152 point 193 (Ruapehu District Council) &amp; 346 point 99 (Rangitikei District Council)</p> <p>X 488 point 14 &amp; 15 oppose X 491 point 15 &amp; 16 oppose</p>	<p>Rule 16.14 Activities affecting flood control or drainage schemes – discretionary activity - opposed</p> <p>Council seeks that rule 16.14 be amended to not prevent TAs from undertaking erosion control and flood control works, as follows. The following activities within a flood control or drainage scheme as shown in Schedule I: (a) the planting of a tree* or shrub* (b) the erection or placement of any building, fence or other structure (including accessways but excluding fences) (c) the erection or placement of a fence perpendicular to a Watercourse (d) the erection or placement of a fence greater than 1.2 m high parallel to a watercourse (e) the deposition of any rock, shingle, earth, debris or other cleanfill (f) any excavation, drilling or tunnelling likely to undermine the functional integrity of a stopbank or river control structure (g) any land disturbance* that impedes access required for maintenance of a river or drainage scheme where the activities listed in (a) to (g) are undertaken in any of the following areas: (h) within the bed of a river or artificial watercourse (i) on a stopbank (j) on any strip of land between an artificial watercourse or riverbed, and 8 m from the inland toe of a stopbank (k) for areas without stopbanks, anywhere within 10 m of an</p>	<p>X 152 point 193 Rejected</p> <p>X 481 &amp; X 491 accepted</p>	<p>Recommendation WTR supported</p>

	artificial		
340 point 131 (Manawatu District Council)  X 488 point 13 oppose X491 point 14 oppose	Rule 16-14 opposed Amend Rule 16-14 to make flood control and drainage activities undertaken by TAs in these areas a permitted activity.	Reject  X 488 & X 491 accept	Recommendation WRT 156 supported
<b>Schedule B Surface Water Quantity (Table B1: Allocation Limits and Minimum Flows by Water Management Sub-zone)</b> <b>Schedule Ba Water Management Zones and Associated Values - Surface Water and Groundwater</b> - <b>Schedule Ba1 Water Management Zones</b> - <b>Schedule Ba2 Surface Water Management Values -</b> - <b>Schedule Ba2.2 How and Where Specific Water Management Values Apply</b>			
Fish and Game New Zealand Wellington Region	<p>The minimum flows and core allocation limits set for the Water management Zones in Schedule B are supported subject to our comment below regarding any change to these.</p> <p>Fish and Game has considered the supporting reports that determined the minimum flows and allocation limits set out in the schedule and accept the overall management intent. We have misgivings, some serious, about the blanket approach to minimum flows and core allocations. It assumes the level of adverse effect will be similar across a range of significantly different instream values. The biggest criticism of various flow setting techniques, and particularly IFIM (RHYHANSIM), is no reputable study has established an anticipated ecological response to any proposed /implemented minimum flow. The council's supporting reports state MALF as being a bottle neck for trout abundance, yet council is prepared to set minimum flows below this in most cases. One must also remember that the MALK figure is derived from flows already abstracted – if MALF was derived from natural flows it would likely be significantly higher, depending on the river. Both these factors give considerable advantage to abstractors.</p> <p>Our overall support though takes account of two very important factors: One, the specification of numerically based minimum flows and allocation limits for all water management zones. Two, the precision with which the council is currently, and says it will continue to expand, monitoring takes via the installation of water meters and telemetry.</p> <p>The certainty provided outweighs our other concerns. We would be extremely concerned, and would not continue to support the proposed minimum flows in Schedule B, if this certainty was eroded or the minimum flows were reduced and/or allocation limits increased.</p>		Schedule B water quality standards are partially supported. Wellington Fish and Game has concerns over establishing minimum flows under 90% of MALF
<b>Schedule D: Surface Water Quality Standards</b> <b>Revised Schedule D is supported –note concern over the recommendation changes to MCI and QMCI standards – Also</b>			
			<b>WFG recommends establishing a deposited</b>

sediment standard			
Tables D1 and D2	are supported		
Table D10:	<p>there are four entries that require change and one river reach to be added</p> <p>Decision sought Tiraumea, lower Tiraumea, Makairo Stream. Reference column map reference should read: “NZMS 260 T24 598 – 831” (The requested map reference correction is the confluence with the Tiraumea River)</p> <p>Lower Manawatu, Turitea, Turitea Stream. Reference column should read: “From the confluence of the Manawatu River at approximate NZMS 260 T24 303 – 880 to approximately T24 363 825” (The requested map reference correction is the confluence with the Manawatu River and up to the lower Turitea Dam)</p> <p>Middle Rangitikei, Pukeokahu-Mangaweka, Rangitikei River. Reference column should read: “From the Mangarere Road Bridge at approximate NZMS 260 T22 483 496 to approximately U21 713 707”</p> <p>Lower Rangitikei, Lower Rangitikei, Rangitikei River. Reference column should read: “From NZMS 260 S23 200 221 to the Mangarere Road Bridge at approximate NZMS 260 T22 483 496” (these last two corrections properly align the classification with the National Water Conservation Order, the downstream extent of which is the Mangarere Road Bridge not the Mangawharariki Stream confluence).</p> <p>Add New row under Lower Rangitikei Mangement Zone as this part of the Rangitikei River has been omitted from the Table. “Lower Rangitikei, Lower Rangitikei, Rangitikei River. Other Trout Fishery. “From NZMS 260 S24 009 000 to approximate NZMS 260 S23 200 221”</p>		
Table D11: Trout Spawning value in the Manawatu Wanganui Region	<p>Spelling corrections need to be made to the following:</p> <p>Tamaki-Hopelands: “<i>Otawaho</i>” should read “<i>Otawhao</i>”</p> <p>Tiraumea: “<i>Makuri River at tributaries</i>” should read “<i>Makuri River and</i></p>		

	<i>tributaries</i> Upper Gorge Upper Pohangina: “ <i>Makewekaweka</i> ” should read “ <i>Makawakawa</i> ” Upper Rangitikei: “ <i>Otutua</i> ” should read “ <i>Oturua</i> ” Middle Rangitikei, Pukeokahu-Mangaweka: “ <i>Porangakai</i> ” should read “ <i>Pourangaki</i> ”		
Water Quality Standards for Table D17: The standards in	stream and rivers in Water Management subzones Table D17 are supported		Revised Schedule B is supported