

Submitter ID:

File No:

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Dr Jill Mckenzie

ORGANISATION (* the organisation that this submission is made on behalf of)

Regional Public Health

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

C/- Campbell Gillam Health protection Officer Regional Public Health
P.O.Box 96 MASTERTON 5840

PHONE

06 3779134

FAX

06 9469881

EMAIL

Campbell.gillam@wairarapa.dhb.org.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

Submission by Medical Officer of Health Regional Public Health . Regional Public Health serves the greater Wellington region through its three district Health Boards Capital and Coast, Hutt Valley and Wairarapa and as a service is a part of the Hutt Valley District Health Board . The Ministry of Health requires us to reduce potential health risks by various means , which includes making submissions on resource management matters.

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:

Date:

29/03/16

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|--|---|--|--|--|
| Name of person/ group making original submission and postal address. | The original submission number can be found on the submitter address list. | Whether you support or oppose the submission. | Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Why you support or oppose each submission point. | The part or whole of each submission point you wish to be allowed or disallowed. |
| <i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood | <i>e.g.</i> submitter S102 | <i>e.g.</i> Oppose | <i>e.g.</i> Oppose all of submission point S102/41 | <i>e.g.</i> The submission point does not recognise... | <i>e.g.</i> Disallow the parts of S102/41 relating to... |
| Interpretation | | | | | |
| The Fertiliser Association of New Zealand Inc. C/- Boffa Miskell Ltd Ground Floor 4Hhazeldean Road P.O Box 110 Christchurch 8140 | 302 | Oppose | Oppose all of Submission Point 302/006 | The interpretation for “health needs of people” is clear that it refers specifically to use of water quality and quantity and to state what it does not include for the purpose of water allocation. It is not intended for the definition to cover air quality. | Disallow submission point 302/006 |
| Objectives | | | | | |
| Java Trust P.O.Box 114 Greytown 5742 | 120 O24 | Oppose | The submitter makes the point that the PNRP as written is too restrictive in applying contact recreation criteria to wetlands. | The applicant when seeking the deletion O24 in its entirety does not recognise that other water bodies require maintenance and improvement of water quality. | Disallow submission 120/007 in its entirety |
| Egon Gutke Glengravel Grove Papakowhai Porirua | 14 O24 | Oppose | Oppose all of submission point 14/009 | Excluding water bodies and headwaters entirely on private land does not reflect the principles of integrated catchment management. | Disallow submission 14/009 in its entirety |

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|---|----------------------------|-------------------|--|---|---|
| Carter Families C/- Landmatters 20 Addington Road RD1 Otaki | 295 O24 | Oppose | Oppose all of submission point 295/022 | Submitters suggested amendment does not adequately address coastal water quality for primary contact nor does the submission adequately address Public Health concerns. | Disallow submission 295/022 in its entirety |
| Fish and Game P.O Box 1325 Palmerston North | 308 O24 Table 3.6 | Partially support | “The quality and quantity of groundwater is managed including through land use provisions and rules to ensure that groundwater continues to provide a sustainable source of high quality water, and surface flow recharge to protect the life supporting capacity, ecological health and cultural and recreational values of freshwater bodies. Amend table 3.6 to delete the narrative in relation to nitrate levels and replace with numerical states for acceptable groundwater drinking concentrations, and insert requirements to maintain water quality and quantity and where degraded such that the ecosystem health of connected surface water bodies is impacted, groundwater quality and quantity is improved | Rather than setting a numerical limit for nitrate, Regional Public Health believes that consideration be given to appropriate responses where monitoring indicates elevated nitrate levels in groundwater sources that are potential human drinking water sources. It is usually not practicable to treat drinking water sources to reduce nitrate levels. Thus it is important that action levels are in place well before the maximum allowable value of 11.3 mg/L is reached. Whether the standard for nitrate in human drinking water is appropriate for this objective depends on whether humans are part of the definition of “Aquatic ecosystem health” or “groundwater dependent ecosystems”. The Policies associated with this objective (P31 and 32) do not appear to indicate this. Rather the water quality issues for human drinking water sources are managed under Policy 69 and are associated with objectives around discharges. As there are a number of submissions concerned about setting a nitrate level and recommending use of the Drinking Water Standard MAV, it would be appropriate to have clarification | Clarify the intent of O24 with reference to groundwater for human drinking water sources. If the intent of O24 is to include the life supporting capacity for humans we recommend: Expand wording of Table 3.6 to state That nitrate concentrations in groundwater do not cause unacceptable effects <u>including groundwater sources that are potentially human drinking water sources.</u> |

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| | | | | around the objective on water quality with reference to human drinking water sources. | |
| Nga Hapu o Otaki 24 Dunstan St Otaki | 309 O24 | Oppose | That table 3.2 be amended to remove the proposed limit of <1000 E. coli objective whilst pending a Waitua decision process. | Because the time frame for a Waitua decision and any subsequent plan change is uncertain, the PNRP should contain interim limits. | Disallow submission 309/10 |
| Wairarapa Water Users Group 235 Pahautea Road RD 1 Featherston | 124 O25(c) | Oppose | Delete O25(c) | Because the time frame for a Waitua decision and any subsequent plan change is uncertain the PNRP should contain interim limits. | Disallow submission 124/005 |
| Wairarapa Water Users Group 235 Pahautea Road RD 1 Featherston | 124 O24 | Partially Support | Support the point raised in the submission regarding further clarification around setting groundwater nitrate levels, but Regional Public Health want to raise the appropriateness of basing this on a human drinking water standard. | Rather than setting a numerical limit for nitrate, Regional Public Health believes that consideration be given to appropriate responses where monitoring indicates elevated nitrate levels in groundwater sources that are potential human drinking water sources. It is usually not practicable to treat drinking water sources to reduce nitrate levels. Thus it is important that action levels are in place well before the maximum allowable value of 11.3 mg/L is reached. Whether the standard for nitrate in human drinking water is appropriate for this objective depends on whether humans are part of the definition of "Aquatic ecosystem health" or "groundwater dependent ecosystems". The Policies associated with this objective (P31 and 32) do not appear to indicate this. Rather the water quality issues for human drinking water sources are | If the intent of O24 is to include the life supporting capacity for humans we recommend: Expand wording of Table 3.6 to state That nitrate concentrations in groundwater do not cause unacceptable effects <u>including groundwater sources that are potentially human drinking water sources.</u> |

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| | | | | <p>managed under Policy 69 and are associated with objectives around discharges. As there are a number of submissions concerned about setting a nitrate level and recommending use of the Drinking Water Standard MAV, it would be appropriate to have clarification around the objective on water quality with reference to human drinking water sources.</p> | |
| <p>Federated Farmers of New Zealand P.O Box 715 WELLINGTON</p> | <p>352</p> | <p>Oppose</p> | <p>Delete the following columns: nitrate from table 3.6</p> | <p>Rather than setting a numerical limit for nitrate, Regional Public Health believes that consideration be given to appropriate responses where monitoring indicates elevated nitrate levels in groundwater sources that are potential human drinking water sources. It is usually not practicable to treat drinking water sources to reduce nitrate levels. Thus it is important that action levels are in place well before the maximum allowable value of 11.3 mg/L is reached. Whether the standard for nitrate in human drinking water is appropriate for this objective depends on whether humans are part of the definition of "Aquatic ecosystem health" or "groundwater dependent ecosystems". The Policies associated with this objective (P31 and 32) do not appear to indicate this. Rather the water quality issues for human drinking water sources are managed under Policy 69 and are associated with objectives around</p> | <p>Disallow 352//080. If the intent of O24 is to include the life supporting capacity for humans we recommend: Expand wording of Table 3.6 to state That nitrate concentrations in groundwater do not cause unacceptable effects <u>including groundwater sources that are potentially human drinking water sources.</u></p> |

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|--|----------------------------|----------|---|---|---|
| | | | | discharges. As there are a number of submissions concerned about setting a nitrate level and recommending use of the Drinking Water Standard MAV, it would be appropriate to have clarification around the objective on water quality with reference to human drinking water sources. | |
| Egon Gutke Glengravel Grove Papakowhai Porirua | 14 O26 | Oppose | Oppose all of submission point 14/010 | Excluding water bodies and headwaters entirely on private land does not reflect the principles of integrated catchment management. | Disallow submission 14/101 in its entirety |
| Vector Gas Limited C/- Beca Ltd P.O.Box 3942 Wellington 6142 | 145 O43 | Oppose | Oppose deletion of the words Human Health | Section 30 of the RMA requires Regional Councils to control discharges of contaminants into or onto land, thus regional councils are responsible for managing all discharges to the environment. Regional Public Health believes that this will also extend to effectively managing contaminated land. The NES for Assessing and Managing Contaminants in Soil to Protect Human Health is triggered at times of land use change, but contaminated land needs managing at other times as well. | Disallow submission 145/024 |
| Policies | | | | | |
| Horticulture New Zealand P.O.Box 10232 WELLINGTON | 307 | Oppose | Oppose all of submission point 307/035 | The submission has raised concerns regarding reverse sensitivity for new housing subdivisions adjacent to production land. However, this needs to be balanced with facilitating sufficient land to meet demands for new housing stock. Reverse sensitivity | Disallow submission 307/035 in its entirety |

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| | | | | issues are best managed through other methods, including rules within the PNRP. | |
| Carterton District Council P.O Box 9 CARTERTON | 301 P83 | Oppose | Oppose deletion of Policy 83 | Regional Public Health understands the submitters concerns that beneficial upgrades may trigger this rule but does not believe that the deletion of the policy in its entirety is the correct mechanism for redress. Regional Public Health recommends that the text of the PNRP be extended to clarify the situation with such discharges. | Disallow submission point 301/052 |
| Masterton District Council C/- Geange Consulting P.O.Box 213 CARTERTON | 367 P85 | Oppose | Oppose all of submission point 367/089 | Regional Public Health believes that the guidelines adequately address the adverse potential human health risk of the activity. To ensure the policy aligns with the most current version of the guidelines, we recommend the policy could be amended to read in accordance with any subsequent revisions of the guidelines. | Disallow Submission Point 367/089 |
| South Wairarapa District Council P.O.Box 6 MARTINBOROUGH | 366 P85 | Oppose | Oppose all of submission point 366/089 | Regional Public Health believes that the guidelines adequately address the adverse potential human health risk of the activity. To ensure the policy aligns with the most current version of the guidelines, we recommend the policy could be amended to read in accordance with any subsequent revisions of the guidelines. | Disallow submission point 366/089 as above |
| Federated Farmers of New Zealand P.O Box 715 WELLINGTON | 352 P94 | Oppose | Deletion of changes avoiding effects on community drinking water supply protection areas | The PNRP Policy 94 as written is adequate to protect human health. | Disallow all of submission point 352/170 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|------------------|--|---|---|
| Wellington Water Private Bag 339804 Wellington Mail Centre Lower Hutt 5045 | 135 P112 | Support | Replacing human health with" health needs of people" supports prioritising the purpose of water takes during periods of water shortage. | | Allow all of submission point 135/109 |
| Rangitane o Wairarapa Inc. P.O Box 345 MASTERTON | 279 P114 | Oppose | Entire Submission | Regional Public Health believes that, notwithstanding the submitter's views, the health needs of people should be recognised in water allocation particularly in a critical water shortage situation. | Disallow all of Submission Point 279/145 |
| Rules | | | | | |
| Federated Farmers of New Zealand P.O Box 715 WELLINGTON | 352 R37 | Oppose | (e)(ii) each resource consent holder for taking water from a community drinking water supply protection area <u>within 1km</u> downstream of the discharge one week before. | Regional Public Health believes that specifying a 1 km in regard to community drinking water supply abstraction points is too restrictive. | Disallow submission point 352/186 |
| Federated Farmers of New Zealand P.O Box 715 WELLINGTON | 352 R42 | Oppose | Deletion of (a) Where the discharge may enter groundwater, the discharge is not located with 50 meters of a bore used for water abstraction for potable supply or stock water | There is potential for such discharges to have an adverse impact on the potability of human drinking water groundwater sources. | Disallow submission point 352/167 |
| Kevin Tearney 1 Simla Crescent Khandallah Wellington 6035 | 154 R55 | Partially Oppose | Requirement for consenting of sites should be risk based but not defined by meeting the NZ Drinking Water Guidelines or ANZECC Guidelines in bores on site or the property boundaries. | Regional Public Health believes the Drinking Water Standards are an appropriate standard for protecting groundwater where the water is a potential human drinking water source. Regional Public is unaware of a more suitable standard. | Disallow the partial submission point 154/004 |

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| Jim Hedley 153 Hikunui Road RD 1 Featherston 5771 | 340 R70 | Oppose | Exclusion of the requirement for discharge of cleanfill to land of a 20 meter buffer zone of a bore used for abstraction for potable supply | There is potential for such discharges to have an adverse impact on potable groundwater drinking supplies if cleanfill content does not meet the definition as contained in the interpretation. The buffer zone is a precautionary approach. | Disallow submission point 340/008 |
| Federated Farmers of New Zealand P.O Box 715 WELLINGTON | 352 R70 | Oppose | Exclusion of the requirement for discharge of cleanfill to land of a 20 meter buffer zone of a bore used for abstraction for potable supply | There is potential for such discharges to have an adverse impact on potable groundwater drinking supplies if cleanfill content does not meet the definition as contained in the interpretation. The buffer zone is a precautionary approach. | Disallow Submission Point 352/191 |
| NZ Transport Agency C/- Beca Ltd P.O. Box 3942 Wellington 6140 | 146 R70 | Oppose | Exclusion of the requirement for discharge of cleanfill to land of a 20 meter buffer zone of a bore used for abstraction for potable supply | There is potential for such discharges to have an adverse impact on potable groundwater drinking supplies if cleanfill content does not meet the definition as contained in the interpretation. The buffer zone is a precautionary approach. | Disallow Submission Point 146/157 |
| Masterton District Council C/- Geange Consulting P.O. Box 213 CARTERTON | 367 R79 | Neutral | Permit activity rule land discharge of treated effluent; Controlled activity for all other land discharges subject to reasonable matters of control, not prescriptive operational or asset management objectives. Provision for alternative discharge designs and methods, not a prescriptive standard based on a single method. | Regional Public Health notes the concerns of the submitter in that the rule as written could potentially limit the aims of Objectives 49 and 50. We would be supportive of further work being undertaken on the wording of Rule 79 to help facilitate discharge of treated effluent to land while still addressing potential risks to human health. | Regional Public Health is neutral on submission Point 367/113. Regional Public Health would welcome further discussion on rule wording to facilitate discharge of treated effluent to land. |

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| South Wairarapa District Council P.O. Box 6 MARTINBOROUGH | 366 R79 | Neutral | Permit activity rule land discharge of treated effluent; Controlled activity for all other land discharges subject to reasonable matters of control, not prescriptive operational or asset management objectives. Provision for alternative discharge designs and methods, not a prescriptive standard based on a single method. | Regional Public Health notes the concerns of the submitter in that the rule as written could potentially limit the aims of Objectives 49 and 50. We would be supportive of further work being undertaken on the wording of Rule 79 to help facilitate discharge of treated effluent to land while still addressing potential risks to human health. | Regional Public Health is neutral on submission Point 366/113. Regional Public Health would welcome further discussion on rule wording to facilitate discharge of treated effluent to land. |
| Carterton District Council P.O Box 9 CARTERTON | 301 R79 | Neutral | Wind Speeds | Regional Public Health notes the concerns of the submitter in that the rule as written could potentially limit the aims of Objectives 49 and 50. We would be supportive of further work being undertaken on the wording of Rule 79 to help facilitate discharge of treated effluent to land while still addressing potential risks to human health. | Regional Public Health is neutral on submission Point 301/061. Regional Public Health would welcome further discussion on rule wording to facilitate discharge of treated effluent to land. |
| Waa Rata Estate 149 Terrace Road Reikorangi RD1 Kapiti Coast | 152 R79 | Partially Oppose | Permit discharge of treated wastewater if it meets certain standards within community drinking water supply protection areas. If such a standard is met it is inappropriate to require a consent subject to discretionary activity status. | Discretionary status is more appropriate for onsite wastewater discharges in a community drinking water supply protection area. | Disallow relevant portion of 152/064 |
| Craig Dairy Farm C/- Opus International Consultants Ltd P.O. Box 12003 Wellington Attn Nicholas Cooper Also supporting parties | 358 R83 | Oppose | Delete (e)(iii) | Retain (e)(iii) to protect community drinking water supply protection areas. | Disallow all of submission point 358/006. Please also refer to our comments with regards to Submission 352 on Schedules M1 and M2. |

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| <ul style="list-style-type: none"> • Gary James Dwyer and Anne Marie Dwyer (112 Haruru Rd, Carterton RD 1) • Lewis Herrick (1513 State Highway 53, Martinborough) • Blair Perry (36 Masterton Strimmer Road, Masterton) • Sandra Joy Shivas (88 Mangahere Rd, Carterton RD 1) • James and Jane Smallwood (10 Homestead Lane, Greytown) • N & S Terry (Richmond Road, Carterton) • Ali Scott & Dion Kilminster (1665 Te Ore Ore Bideford Road, Masterton RD11) • AB & DE Smith (60 Chester Road, Carterton) • Beryl Masters Stuart (107 Manuka Street, Masterton 5101) • Garry Daniel (Te Ore Ore Road) | | | | | |
| Wellington Water Private Bag 339804 Wellington Mail Centre Lower Hutt 5045 | 135 R83 | Support | Retain (e)(iii) | Retain (e)(iii) to protect community drinking water supply protection areas. | Allow submission Point 135/179. Please also refer to our comments with regards to Submission 352 on Schedules M1 and M2. |
| Federated Farmers of New Zealand P.O. Box 715 WELLINGTON | 352 R83 | Oppose | Deletion of (e)(iii) | Retain (e)(iii) to protect community drinking water supply protection areas. | Disallow submission Point 352/179. Please also refer to our comments with regards to Submission 352 on Schedules M1 and M2. |
| Federated Farmers of New Zealand P.O. Box 715 WELLINGTON | 352 New Rule | Partially Oppose | New Rule application of collected animal effluent onto or into land from new premises. | Include clause to include discharge into a community drinking water supply protection area, as a matter of control. | Allow the Submission Point 352/198 and include a clause (f) the discharge is not located in a community drinking water supply protection area as shown on maps 26, 27a, 27b or 27c. |
| Minister of Conservation RMA Shared Services Department of Conservation Private bag 3072 Hamilton 2240 Attention Rachael Penney | 75 R88 | Support | Amend R88 to make the aerial discharge of VTAs a permitted activity, delete control (b) and the matters of control 1-3. Amend the Plan to permit discharge of VTAs to water, such as by amending R88 as follows: The discharge of a vertebrate toxic agent into water or onto or into land and where it may enter water by aerial application... | The application of VTA is well managed under the existing HSNO Act and associated regulations such that a permitted activity status is appropriate. | Allow submission Point 75/136 |

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|---|----------------------------|----------------|---|---|--|
| <p>Craig Dairy Farm C/- Opus International Consultants Ltd P.O.Box 12003 Wellington Attn. Nicholas Cooper</p> <p>Also supporting parties</p> <ul style="list-style-type: none"> • Gary James Dwyer and Anne Marie Dwyer (112 Haruru Rd, Carterton RD 1) • Lewis Herrick (1513 State Highway 53, Martinborough) • Blair Perry (36 Masterton Stronaw Road, Masterton) • Sandra Joy Shivas (28 Mangahere Rd, Carterton RD 1) • James and Jane Smallwood (19 Homestead Lane, Greytown) • N & S Perry (Richmond Road, Carterton) • Ali Scott & Dion Kilminster (1665 Te Ore Ore Bideford Road, Masterton RD1) • AB & DE Smith (50 Chester Road, Carterton) • Beryl Masters Stuart (107 Manuka Street, Masterton 510) • Garry Daniell (Te Ore Ore Road) | <p>358</p> <p>R89</p> | <p>Oppose</p> | <p>Amend the rule by deleting condition (d)(iii).</p> | <p>Retain (d)(iii) to protect Community drinking water supply protection areas</p> | <p>Disallow submission point 358/007 Please also refer to our comments with regards to Submission 352 on Schedules M1 and M2.</p> |
| <p>Schedules</p> | | | | | |
| <p>Federated Farmers of New Zealand P.O Box 715 WELLINGTON</p> | <p>352</p> <p>M1, M2</p> | <p>Neutral</p> | | <p>Within their submission they note that the PNRP does not provide objectives for drinking water quality. We note that O23 states the quality of water is maintained or improved and O46 states discharges to land are managed to reduce the runoff or leaching of contaminants to water. Policy 69 provides the</p> | <p>Regional Public health is neutral on submission point 352/284. Regional Public Health welcomes further discussion of the derivation of community drinking water supply protection areas and the practicalities of their use for implementing the NES for Sources of Human Drinking Water.</p> |

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| | | | | <p>intended course of action and rationale for a focus on discharges potentially impacting on human drinking water supplies to support Schedule M. We acknowledge the submitters point that the objectives could be strengthened to provide the direction and justification for a focus on community drinking water supply protection areas, by referring to “the quality of water meeting the range of uses and values for which it is required while supporting the life supporting capacity of water and aquatic ecosystems to be safeguarded” – wording taken from the existing Regional Freshwater Plan.</p> <p>Our concern with this submission is the justification that the need for community water supply protection areas is less as water quality in the Wairarapa “shows no significant water quality issues”. The rules need to ensure that there is no impact on the future quality of groundwater sources, as the impact of land uses on groundwater have a delayed effect. Relaxing controls on the basis of current status will not support the on-going life supporting capacity of the groundwater ecosystem.</p> <p>Furthermore the NES for Sources of Human Drinking Water state that when a community drinking water supply meets the health quality criteria then a permitted rule cannot allow an activity unless it has satisfied that the activity is not likely</p> | |

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| | | | | <p>to introduce or increase any determinands after existing treatment methods, or for a supply not meeting the compliance monitoring procedures, not likely to increase the determinands at the abstraction point by any more than a minor amount. This allows the maintenance of the current levels of determinands and not allowing activities to continue until the health trigger level is reached (the MAV), at which point the water may no longer be considered suitable as a drinking water source.</p> <p>Given the complexity of what impacts on groundwater sources, and the need for human activities to support health via economic well-being, we would welcome being part of any further discussions around the derivation of the community drinking water supply protection areas and application of these to support implementation of the NES.</p> | |
| Maps | | | | | |
| Horticulture New Zealand P.O.Box 10232 WELLINGTON | 307 | Oppose | Delete Maps 26, 27a, 27b, and 27c, community drinking water supply protection areas and replace with community drinking water sources. | Given the complexity of what impacts on groundwater sources, and the need for human activities to support health via economic well-being, we would welcome being part of any further discussions around the derivation of the community drinking water supply protection areas. This discussion can include how effective the NES | Oppose all of submission point 307/080 in its entirety. |

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|--|--|--|--|---|--|
| | | | | <p>for Sources of Human Drinking Water can be at achieving the intent of the Community drinking water supply protection areas and the additional value in defining these protection areas within the PNRP to adequately protect human health.</p> | |
|--|--|--|--|---|--|