



05 June 2009

Tim Porteous  
Greater Wellington Regional Council  
P O Box 11-646  
Wellington

Dear Tim,

**Re: Proposed Regional Policy Statement for the Wellington Region**

Please accept this letter as a formal submission from the Wairarapa Regional Irrigation Trust to the Proposed Regional Policy Statement (RPS) as released by Greater Wellington in March 2009.

This submission focuses on the provisions that relate to Freshwater and landuse.

Overall, the Wairarapa Regional Irrigation Trust is supportive of the concepts outlined in the Statement particularly the emphasis on efficient water use.

The specifics of the submission are as follows and are in the order as they appear in the Proposed RPS document:

Section 2. Promoting sustainable management in the Wellington region

2.4 – Integrating management of natural and physical resources

The Trust supports the concept of management on a water catchment basis.

Wairarapa Regional Irrigation Trust  
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Section 3. Resource management issues, objectives, and summary of policies and methods to achieve the objectives in the Regional Policy Statement

3.4 Fresh water

Page 34 – it is unhelpful to speculate on causes of elevated nitrate levels without evidence – The Trust asks that the wording be amended to “This could be from farming or from septic tanks.”

The recognition that water resources are limited and in some cases fully allocated and the impact of climate change in increasing this pressure is supported by the Trust.

The statement that Wairarapa ground water levels are declining year by year without some indication of a reason is not helpful. If it is due to abstractions, then this is within the Council's control. If not, then some research is needed on the naturally occurring circumstances causing this ongoing decline.

The same is true of the statement on low flows in surface water, is this natural or within Council control?

3.8 Natural hazards

Page 52 – the recognition that climate change will result in a drier Eastern part of the region and a wetter Western part including the Tararua range is supported by the Trust.

Some comment should be made on the water management issues/opportunities coming out of this in terms of water harvesting and flow augmentation. This should reflect the benefits to the region from allowing for the best, most efficient use of water to be made at the times of greatest need by harvesting and storing in times of surplus.

3.11 Soil and minerals

Page 69 - The recognition that the region contains highly productive soils that have an economic value as an input to primary production and should be protected in some way from non-primary sector development such as subdivision is welcomed by the Trust.

#### 4. Policies and methods

Policy 11: Maintaining and enhancing aquatic ecosystem health in water bodies – regional plans

The safeguarding of habitats and ecosystems is supported. The Trust welcomes the recognition that water bodies may be managed for other than environmental purposes and that in these cases, base limits will be established. These limits will need to take account of all of the potentially competing needs of the different management purposes.

Policy 12: Allocating water – regional plans

The Trust believes that it is vital that any policies and/or rules on allocation limits are clear, definitive and based on scientific fact. They must also be set in consultation with all users of the resource.

Policy 18: Using water efficiently – regional plans

The Trust strongly supports this policy. The basis of any Regional Irrigation Scheme promoted by the Trust will involve water harvesting and the subsequent efficient use of the water as a way of effectively and efficiently maximising the value of a natural resource for regional benefit.

Policy 43: Managing water takes to ensure efficient use – consideration

The principle of ensuring that water takes are not beyond whatever is required for any particular land use is supported. However, The Trust believes that the limits set must be based on local conditions and science rather than the application of standards from other regions or national guidelines.

The requirement to measure and report water takes implies that the Council will actively analyse this data to assist in managing the resource. Given that the consent holder is undertaking much of the work at their cost, the fees for consents should reflect this.

Policy 65: Promoting efficient use and conservation of resources – non-regulatory

The Trust is pleased to see the recognition of the role that the Council has in information gathering and dissemination to assist people to use the resources efficiently and effectively.

We also support the investigation of transferable water permits of some form and would like to be involved in that investigation.

We would like to be heard in support of this submission.

Yours sincerely,

Bob Tosswill

Bob Tosswill  
Chairman