

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](http://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](mailto: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

Richard Winder

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

Rural Residents Environment Society Incorporated

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

PO Box 47116,  
Trentham 5143,  
Upper Hutt

PHONE

04 5298925

FAX

EMAIL

info@greytowngold.com

### 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.

The Rural Residents Environment Society Incorporated has an interest in Council plans upholding the principles of the RMA and specifically with respect to contamination of rural land by non primary production activities. The Society was established amongst other objectives "To be active in the planning and resource management issues involving the local community and its residents, ratepayers and businesses".  
We made an original submission to the PNRP (S125)

### 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: Submitted by email

Date: 29 March 2016

*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.

<b>Details of the submission you are commenting on</b>  Name of person/ group making original submission and postal address.	<b>Original submission number</b>  The original submission number can be found on the submitter address list.	<b>Position</b>  Whether you support or oppose the submission.	<b>Part(s) of the submission you support or oppose</b>  Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions.	<b>Reasons</b>  Why you support or oppose each submission point.	<b>Relief sought</b>  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...
The Oil Companies	S55	Support	S55 Section 3.8 Air O41 Support the suggested additional wording to O41	The submission provides a hierarchy of managing adverse effects. This hierarchy can be applied to many of the objectives and rules.  We agree that the adverse effects on soil and water from land use activities must be avoided and remedied and where the activity is causing an effect should be minimised. Mitigation should only be considered where the effects cannot be avoided, remedied or mitigated. Having mitigation as part of the objective still allows adverse effects to occur in circumstances where they need not do so because of measures which could be taken to avoid, remedy or minimise. Mitigation should only be permitted where there are exceptional	Add where appropriate in objectives and rules the following words in place of “reduce” or “manage”: <u>“are avoided, remedied or mitigated”</u>

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
				<p>circumstances.</p> <p>While we support the word “reduce” which shows improvement, having a hierarchy which makes the first alternative to avoid a risk is more effective.</p> <p>In general we do not favour the word “manage” as it is open to interpretations such as manage well or not so well.</p>	
The Oil Companies	S55	Support	S55 Section 3.9 Soil O44	Reasons above	Adopt the Oil Companies’ recommendation.
The Oil Companies	S55	Oppose	S55 Section 3.11 Discharges O46	The suggested changes and the original objective are inconsistent with the reasons above.	Discharges to land are managed to <u>avoid or where that is not possible</u> to reduce the runoff or leaching of contaminants to water.
NZ Dairy and Fonterra Co-operative Group	S316	Partially support	S316 Method M28 Good Management Practices	<p>We support the development of Good Management Practices. We believe that there should be a hierarchy of practices from (where they exist) International Standards, particularly ISO and AUS/NZ Standards International best practice and then industry best practice. We caution that allowing industry to have too great an influence on the development of GMPs is likely to slow the achievement of a sustainable environment.</p> <p>Industries generally have advocacy groups which submit in their best interests, not necessarily in the best</p>	To include in Good Management Practices as a hierarchy: ISO Standards, AUS/NZ Standards and International Best Practice; industry best practice.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
				interests of the environment or the community.	
NZ Dairy and Fonterra Co-operative Group	S316	Oppose	S316 Definition: Good Management Practices	Reasons given above	Amend the original definition to include a hierarchy of GMP as stated above.
Federated Farmers	S352	Oppose	Definition: Good Management Practices	Reasons given above	Amend the original definition to include a hierarchy of GMP as stated above.
NZ Pork	S359	Oppose	Reverse Sensitivity	We can not predict what future uses of rural land may be. Therefore new and innovative uses of land should not be unduly restricted by reverse sensitivity considerations. It is important protection for emerging industries, particularly as more activities become organic.	Retain proposed content about reverse sensitivity.
South Wairarapa District Council	S366	Oppose	We oppose the parts of the submission where the submitter does not recommend what specific relief is sought and just requests amendment but provides no words to meet this requirement.	The Council appears to be highly critical of large sections of the PNRP. It appears to oppose clauses on the grounds of ambiguity.  It also requests that there is consultation with all key stakeholders but does not define who these are. A major group of stakeholders are the ratepayers and consequently if there is to be further consultation it should be open and transparent.	If there is a decision to significantly amend the PNRP in accordance with this submission, then we request that there be a further round of submissions and further submissions.
South Wairarapa District Council	S366 #77 Policy 95	Partially Oppose	We oppose the suggested relief sought.	It is important to retain a policy on discharges to land as land is the filtering mechanism for cleaning water.	We recommend to retain the current policy with the provision that management be initially to <b>avoid</b> discharges and <b>where that is not possible</b> ensuring ...

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
South Wairarapa District Council	S366 #46 Objective 46	Oppose	We oppose the suggested additional words "adverse effects"	Inserting these words will mean that expensive testing will have to be done and it will not account for contaminants which are accumulative. A measurement taken near the start of a discharge will be of little use when the contaminant has an accumulative effect.	Discharges to land are managed to <u>avoid or where that is not possible</u> to reduce the runoff or leaching of contaminants to water.
NZ Transport Agency	S146	Support	Page 30 New Policy RMA Framework for avoiding, remedying and mitigating the effects.	Having a hierarchy for managing adverse effects will bring clarity to both policy and rules.	Add a new policy as suggested by NZ Transport Agency

If you require more space for additional comments, please insert new rows as needed