

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

FULL NAME

-

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

The Mansell Family

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

C/O Land Matters Ltd, 20 Addington Road, Otaki 5581

PHONE

06 364 7293

FAX

EMAIL

anna@landmattersnz.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 Mansell Family are landowners and farmers in the Wellington Regional and for this reason we have an interest in the PNRP that is greater than the interest the general public has.

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:

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...
Stewart Barton	S6	Submittor opposes R94(a) and 95(a)	Support	Oppose 5m setback from waterbody for the reasons given in submission	Delete R94(a) Support an amendment to Rule 94(b) to support best practice of starting break-feeding at far-side of paddock.
Stewart Barton	S6	Submittor opposes Rule 95(A)	Support	As above. R95(c) sufficient	Delete Rule 95(a)
Stewart Barton	S6	Submittor opposes R121(e) ; Amend R121(h); Amend R121(i); Amend R121(k)	Support	Oppose provisions to restrict clearance of drains; retain vegetation on one side of drain; rules are only relevant if water is in the drain	Support best practice in clearing drains Should not apply to ephemeral water courses where the drain is dry Support other recommendations of submittor
Neville Fisher	S12	Support R83	Support	Inclusion of specific limits as a matter of control	Amend to seek a delayed timeframe within which R83(g) is imposed.
CT and EM Brown	S13	Amend O25	Support	Oppose all provisions relating to restoration or enhancement outside the Coastal Environment unless it is specified that it restoration is being sought "over time."	Delete references to the non-compulsory values (e.g. Mahinga Kai) (under the NPS – FW) throughout the Plan until the Whaitua process is complete. Retain only compulsory values . Delete O25(b) OR include "over time" at the end of O25(b)

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
CT and EM Brown	S13	P7 and P 8 – Amend	Support identification of stormwater channels	For reasons given by submittor	Support clearance of existing stormwater drains as a permitted activity
CT and EM Brown	S13	P39 – Amend	Support	Support making making provision for measures to remedy or mitigate effects particularly if there are no other alternatives.	Add “unless no other alternative solutions exist and all adverse effects can be remedied and/or mitigated.”
CT and EM Brown	S13	P78 – Support	Oppose	This policy relates to new requirements for all stormwater runoff to require resource consents. We would not support this amendment in the rural zone generally.	Delete provision
CT and EM Brown	S13	P101 – Amend	Support	Oppose exclusion of <u>all</u> livestock from waterbodies – sheep are not naturally inclined to enter waterbodies and hill country paddocks can make it impractical to fence; as well as oppose planting along both sides of riparian margins	Delete (a), (b) and (c). Leave policy at word, “encouraged.” Support requirement for water troughs to be placed <u>in low-land paddocks where it is not practicable to fence stream.</u>
CT and EM Brown	S13	P97 – Amend	Support	For the reasons set out in the submission	Amend Rule R97(d) being the timeframes. Amend definition of livestock to exclude dry cows and heifers when describing diary cows.
Egon Guttke	S14	Oppose C Definition for Erosion Prone Land	Support	For reasons set out in submission. The proposal is not consistent with territorial authority provisions (District Plans). Proposed change (i.e. new definition of erosion prone land) has not been adequately justified	Retain existing definition of erosion prone land
Egon Guttke	S14	O24 – oppose “any contact recreation” and “Maori Customary Use”	Support in part	Oppose all provisions in the PNRP that give effect to the “non-compulsory values” (e.g. managing water for contact recreation and Mahinga Kai) without having discussions with the communities of those catchments as to whether they are the appropriate values to apply.	Amend to refer to “secondary recreation” and place “mahinga kai” with the definitions of “mahinga kai” as set out in the NPS – FW.
Egon Guttke	S14	O33 – Oppose	Support	Clarify what “mana whenua” values are to provide more certainty for landowners	Support reference to Schedule C provided reference to “restoration” is removed.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Egon Guttke	S14	O25 – Oppose	Support	For reasons given by submitters and because restoration is only compulsory in the coastal environment	Amend to either delete references to “restoration” OR include at the end of the sentence “... where the site is located in the coastal environment.”
Egon Guttke	S14	P10 – Oppose	Support	Support for the reasons given by submitters	Support either deleting this policy or amending to refer to “secondary contact” and deleting sub-clauses a – d as these are non-compulsory values that should be determined or a catchment by catchment basis.
Egon Guttke	S14	P17 – Oppose	Support in part	Oppose the use of the word, “mauri” when used in isolation. Support this policy where it references the NPS-FW definition of ‘mahinga kai – kei te ora te mauri’ instead. The freshwater resources would be available for customary at some places but not everywhere.	Delete definition of “mauri” in section 2 of the Plan and instead replace it with the terms for ‘mahinga kai’ as defined in the National Policy Statement for Freshwater
Egon Guttke	S14	P18 – Oppose the words, “having particular”	Support	For reasons given by submitter	Seek that these words are deleted from P18(a)
Egon Guttke	S14	P32 – Oppose the use of the term “residual adverse effects”	Support in part	For the reasons given by submitter	Seek the word “significant” be added before or after the word “residual” so that it reads “significant residual”
Egon Guttke	S14	P40 – Oppose references to restoration	Support	Remove all references to restoration unless in the coastal environment	“Protect and restore” implies there can be no use of that resource instead amend to read, “provide and restore over time where possible...”
Egon Guttke	S14	P44 – Oppose “avoidance of all activities in sites with mana whenua values”	Support in part	We oppose this policy in its entirety. It should be deleted on the basis that all activities are entitled to be considered on their merits and this policy is affectively rendering these activities “prohibited.”	Delete P44
Egon Guttke	S14	R115 – oppose	Support in part	Oppose the maximum size a culvert can be under R115(h)(ii)	The culvert size needs to be appropriate to the size of the catchment. Allow large maximum sizes for catchments on the west coast.
Egon Guttke	S14	R116 – oppose in part	Support	Amend size of catchment when considering size of dams.	Amend R116(m) to 200ha

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
NZ Steel	S15	Amend definition of contaminant	Support in part	Support the inclusion of a definition of contaminant	Do not support including the definition “as described in Table 3.1 to 3.54” and do not support inclusion of term “natural soil particles.” Support inclusion of “sediment at levels known to adversely affect aquatic health” and then referencing tables that describe that numerically
Allan Smith	S35	Oppose in part O27 regarding riparian margins	Support	For the reasons given by submittor.	Amend O27 to read, “the benefits of riparian margins are promoted and landowners supported to establish and maintain vegetated riparian margins where practicable..”
Allan Smith	S35	O33; O35 – Oppose in part	Support in part	Oppose restoration unless it is in the mandatory context (i.e. coastal environment as required under the NZCPS) or where “restoration” is to occur over the long-term Also suggest adding the words, “the values of” Prior to “sites of significance”	Add words after “restoration” – “outside the coastal environment, restoration is sought for the long term where practicable.” O35 could read, ‘ecosystems and their habitats with significant indigenous biodiversity values are protected from inappropriate use and development where possible.’
Allan Smith	S35	P17 – Mauri – Oppose	suSupport in part	Oppose the use of the word, “mauri” when used in isolation. Support this policy where it references the NPS-FW definition of ‘mahinga kai – kei te ora te mauri’ instead. The freshwater resources would be available for customary at some places but not everywhere.	Delete definition of “mauri” in section 2 of the Plan and instead replace it with the terms for ‘mahinga kai’ as defined in the National Policy Statement for Freshwater
Allan Smith	S35	P41 – Oppose in part the references to “protect and restoration”	Support in part	Protect and restore assumes that there can be no use of that resource when in reality all activities, unless the effects are so clearly significantly adverse, should be assessed on a case by case basis	Amend to read, “provide for and restore over time where required the following ecosystems ...”
Allan Smith	S35	P94 and P95 – Oppose in part the references to “protect and restoration”	Support in part	Oppose Rule 94(c) Oppose Rule 95(b) For the same reasons given by the submittor	Delete Rule 94(c) Delete Rule 95(b)

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Allan Smith	S35	R115(h)(ii) and h(iii) – Oppose	Support	Oppose size of maximum permitted culvert. Size is too small to accommodate catchments and rainfall experienced on the West Coast	Amend to increase diameter to 1.65m or larger.
D. Wood	S38	R97 – Oppose in Part	Support	For reasons set out in submission	Support all changes proposed by submittor. Also seek that definition of diary cows exclude hieffers and dry cows
Kairoa Farms	S74	R97 – Oppose in Part	Support	For reasons set out in submission	As above
Department of Conservation	S75	P4 – Oppose in part	Suport	Each activity should be considered on its merits. P4(b) effectively makes those activities a prohibited activity	Delete P4(b) and amend P4(c) to include “where possible over time, the activity ...”
Department of Conservation S75	S75	R37 – Support	Support	Delete (f)(i) for the reasons given in DoC’s submission	Delete R37(f)(i)

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