

Proposed Natural Resources Plan:

Submitter:

Sustainable Wairarapa Inc

Submitter Number:

S167

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region

This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

To:
Freepost 3156
Wellington Regional Council
PO Box 11646
Wellington 6142

Your details

Full name: **Don Bell (Sustainable Wairarapa Inc Convenor)**

Organisation name (if applicable): **Sustainable Wairarapa Inc**

Address for service:
**114 Cornwall Street
Masterton 5810**

Telephone no's:
Work: **027 555 2885**
Home: **06 377 1884**
Cell: **027 555 2885**

Contact person: **Don Bell, Convenor, Sustainable Wairarapa Inc**

Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email.
We will send you updates on the process, information and provide you with details of any meetings and the hearing.
Email address: bellhouse@xtra.co.nz; ray@bagend.nz

Trade competition

I/we **could not** gain an advantage in trade competition through this submission *[If you ticked this box, delete the rest of this section and go straight to 'Your submission']*

I/we are **not** directly affected by an effect of the subject matter of my submission that adversely affects the environment, and does not relate to trade competition or the effects of trade competition.

Your submission

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:
Sustainable Wairarapa Inc (SWI) submission on GWRC's Proposed Natural Resource Plan.

SWI general:

- **3.6, 4.5:** Wetland (current) restoration management plans – how is progress being measured? Are wetland restoration plans incorporated into flood management plans? Is there provision to restore/recreate wetlands?
- **3.6, 4.5:** Does the plan ensure that all remaining wetland habitats are protected as s6(c) RMA habitats?

- **3.13, 4.4, 4.5, 4.6:** While DOC is responsible for marine reserves, how can GWRC work with DOC to identify and coordinate these within the plan? What are the rules for estuaries?
- **3.13, 4.4, 4.5, 4.6:** A point has been made with regard to coastal areas and how the NZCPS refers specifically to the coastal environment which has broad implications for the wider coastal environment, but GWRC's Proposed NRP uses only coastal marine areas which has a much more narrow definition. Is the NRP required to give effect to the NZCPS and does GWRC feel it has done so? The question of motor vehicles on foreshores has also been raised.
- **3.8, 4.7:** Masterton's Air Quality 'plan' was authorised a few weeks ago, but given the overlap with MDC how do GWRC propose to ensure MDC meet the 2020 deadline?
- **3.6, 4.8:** Stormwater issues are an important consideration in MDC's flood control plans; how has GWRC addressed this in their flood plan options for Masterton?
- **3.4:** While GWRC has a separate climate change Strategy how has climate change been incorporated in the environmental management outcomes of the NRP?
- **3, 4:** There are many open-ended timelines in this document; noting that the NRP is 'technically' (the current plan is into its seventeenth year) a ten year plan, nonetheless progressive timeline objectives, regular review dates and/or fixed dates need to be added.
- **3, 4:** It has been suggested that Forest & Bird's submission on the National Environmental Standard on Plantation Forestry be appended to GWRC's proposed natural resource plan as it raises in that context erosion risks and consequences, sedimentation and water quality, coastal environment, wetlands, riparian vegetation and SNA's, native fish, native fauna, wilding conifers, genetically modified organisms, etc. (A copy can be forwarded if required.)
- **3.5, 4.8:** How is GWRC going to ensure that the freshwater objectives are met? There is nothing in the plan that ensures the freshwater objectives can be met, e.g. in the form of a resource consent. This is of particular concern to cumulative impacts of agriculture rather than point source discharge.
- **4.8:** How does GWRC intend to achieve the PNRP Freshwater Objectives, given the apparent lack of any provisions to ensure that farming in the region is sustainably managed?
- **3.6, 4.5:** Why does the plan not include key freshwater parameters to provide for life supporting capacity and ecosystem health, including DIN and DRP, dissolved oxygen, deposited sediment, or natural character (NCI)? Why was the list originally proposed to be included in the plan subsequently removed?
- **4.1:** How has it been determined that the provisions in the BRL (beds of rivers and lakes) section of the plan are the most efficient and effective means of achieving the plans objectives, given that no section 32 analysis has been undertaken for the BRL sections?
- **3.6, 4.5:** Does the plan ensure that minimum flows, and core allocations safeguard the life supporting capacity, ecological processes, and natural character (hydrological regime) of freshwater and freshwater habitats? The core allocation of 50% MALF (mean annual low flow) is of concern especially as many of the Wairarapa rivers flow at low flow for prolonged periods of time (flat-lining occurs).
- **3.6, 4.2:** Does the plan ensure that rivers are sustainably managed by flood protection and river management activities? How does the plan ensure that the natural character of rivers in relation to their form and function are protected?

Provision Code Number: 1.1

Title: Overview of the Wellington Region

Reason for Feedback: Table 1.1: values: Why the focus on water? What about the values associated with the other forms of natural capital?

Changes Sought: *Include and revise tables to identify values associated with soil and minerals, biodiversity, the atmosphere*

1.4.2

Identifying issues – community views, scientific and technical information

Recognise the value of "human capital" - see "Growing for Good" - the knowledge skills, competencies and attributes of community residents. Ensure they receive an appropriate formal status.

Give formal status to people with local knowledge, expertise, competencies etc when considering submissions to plans and consent applications

2.2.78

Drain

I note reference to "Tile drains" in some sections

There are various forms of sub-surface drains which need better definition. The plan is silent on discharge from tile drains; are they a 'point source' discharge? Is sediment as well as nutrients assessed as part of the discharge from tile drains? There is a need to work with the community to raise awareness and establish good practice to mitigate effects of tile drains.

5.4.3

LW.R92

Rule LW.R92: Access to the beds of Category 3 surface water bodies by livestock – permitted activity

Land managers need clarity in order to decide which rule(s) apply to their particular streams and wetlands.

A landowner risks wrongly identifying the rule(s) which apply to their particular surface water bodies - it is very difficult having to wade through the definitions, whether ephemeral or outstanding, what category, mana whenua value (what iwi) schedules, maps, websites etc. and be sure you have it correct

Consider including table(s) which name streams and wetlands (or parts thereof) and listing which rule(s) apply

LW.R94

Rule LW.R94: Access, up until seven years after the date of notification of this plan as proposed, to the beds of Category 2 surface water bodies by cattle (including dairy cows), farmed deer and farmed pigs – permitted activity
There is a long introductory period before Rule LW R94 applies. In some cases this is allowing landowners to continue with bad practices. Where communities have invested much time and money in stream restoration projects, such activities jeopardise the investment downstream.

Provide for communities to apply for a special category to be granted to restoration projects. Make provision for the effects of stock access to be controlled as for Rules LWR97 and 98

5.5.3 LW.R111: Reclamation of outstanding natural wetlands – prohibited activity

Amend

This rule has a condition to meet the general conditions for wetlands. The conditions do not take into account the fact that there are a number of large wetlands within the Wairarapa Moana space and so the requirement to remove machinery every night is impractical when the machinery may have to be moved more than a kilometre.

Make provision for machinery to be parked on elevated ground within the wetland overnight. Accepted that this could be worked into a restoration and management plan

5.5.3 LW.R104: Structures in natural wetlands and significant natural wetlands – permitted activity

Amend

The rule only allows hand held machinery to be used. Again within some of the larger wetlands this is not practical.

Make provision for machinery to be utilised where there are existing access tracks within both large and small sized wetlands. Can a stop bank be removed under this permitted rule?

5.5.3 LW.R105: Planting and pest plant control in natural wetlands, significant natural wetlands and outstanding natural wetlands – permitted activity

Amend

In any large scale planting jobs machinery may be the most practical option.

Allow the use of machinery on large scale planting jobs.

5.5.3 LW.R106: Restoration of natural wetlands, significant natural wetlands and outstanding natural wetlands – controlled activity

Amend

The current requirement for land owners to fund resource consent for restoration purposes is a deterrent to the landowners becoming active in restoration projects on their property.

Strongly support the waiver of resource consent fees – linked to all plans.

5.5.3 LW.R106: Restoration of natural wetlands, significant natural wetlands and outstanding natural wetlands – controlled activity

Amend

Restoration management plans will take some years to be introduced to the Wairarapa Moana wetland owners.

I'd like to see a transitional arrangement in the interim. For example, the initial phase of the Freshstart for Freshwater Cleanup Fund is winding down however there are still works to be completed within significant wetlands. A requirement to develop a restoration and management plan will significantly delay these works.

5.5.3 LW.R107: Activities in natural wetlands and significant natural wetlands – discretionary activity

Amend

As for rule 106 plus the ability to waive resource consent fees.

Transitional arrangement plus the use of waiving resource consent fees to encourage restoration of wetlands.

5.5.3 LW.R108: Activities in natural wetlands and significant natural wetlands – non-complying activity

Amend as for Rule 107

5.5.3 LW.R109: Activities in outstanding natural wetlands – discretionary activity

Amend as for Rule 107

5.5.3 LW.R110: Activities in outstanding natural wetlands – non-complying activity

Amend as for Rule 107

5.5.3 LW.R111: Reclamation of outstanding natural wetlands – prohibited activity

Amend as for Rule 107

5.5.5 LW.R121: Maintenance of drains – permitted activity

Amend

The rule as written is impractical. Drains or long wetlands can be wide or narrow, gravel or sand based, fenced off, have a developed riparian margin, have no riparian margin, have noxious plants in abundance, have a steep or gentle batter slope, are part of a pumped or gravity drainage system sometimes closed from the downstream catchment and are therefore maintained for a variety of reasons. Within the Wairarapa Moana catchment the network is extensive exceeding 1300 kilometres in length. The rules as currently written provide one prescription for the maintenance of this extremely diverse drainage network and they stifle innovative solutions to their management.

1. Amend section f to allow drains to be changed from the classic U shape to a V or benched batter slope.

2. Amend section g. The following is a comment from a farmer "A slotted bucket will let some of the eels get back in to the water but also a percentage of the material that you are trying to get out.

Meaning a larger amount of silt falling back in the water requiring a second attempt to remove it.

Slotted buckets by their design are much weaker and require more maintenance

Many contractors use a standard wide bucket with large circular holes on the back and sides of the bucket what is wrong with this.

I'm not sure about the price of a weed bucket but \$5000 sounds about right as you have to get them made you cannot buy them off the shelf.

HireMax said to me they would sell me a standard wide bucket and they could modify it to whatever I wanted."

3. Amend section h attached comment from a farmer "If I see a FISH in a bucket full I lift out, I stop and put it back in the water straight away if I wait an hour it will be dead

If I see a perch, rudd, goldfish, tench, etc, etc do I get brownie points for everyone I leave out of the water.

Many eels don't come out of the mud or weed within an hour I usually walk back up the cleanings every couple of hours when I have a break.

If I see an eel heading off in the wrong direction from a bucket of cleanings I usually stop and chuck it back in the water at the time.

(It will only be a matter of time before we are required to have someone walk behind a digger sorting out what comes out of the drain)

I try to put the cleanings in a position that naturally lets them find their own way back in the water.

In the middle of summer an eel out in the sun might not last an hour.

During spring, autumn, and winter or if the ground is wet they can last for days. "

4. Amend section j again a comment from a farmer "Many drains are only as wide as a bucket on a digger so how do you clean only one third of it.

There are dozens of different types of drains all requiring a different approach." "I don't always carry around a weed bucket in my back pocket (about 1 and a half tons) so if I am going from one part of my farm to another with my

wide bucket on, (which I usually do) and see something blocking the creek, a branch of willow, or a big clump of weed I would take it out as I go past, so what's wrong with that." There needs to be a reference to the scale of the maintenance relative to the drainage network within a landowner's property. Over the years there have been a small number of operators who have been found to have killed native fish perhaps it needs to be recognised that 80% or perhaps more are diligent operators who care about the environment.

5. Amend section k again a responsible farmer responds "The most confusing thing I notice is that they say start work from upstream working down but if you do that you cannot see what you are doing because the water is cloudy so you will miss some areas or will have to take several buckets full to check that you have got it all."

6. Allow the placement of sediment traps, rocks (to increase diversity in fish habitat), and drums for the same purpose. In time there could be the creation of such fish "shelters" throughout the drainage network reducing prescriptive rules.

7. Consider carefully the guidelines/code of practise developed by Environment Canterbury which allows flexibility dependant on the conditions on site.

5.5.5 LW.R122: Removing vegetation – permitted activity

Amend

As for rule 121 there are issues regarding practicality regarding bucket type, return of native fish.


Amend the appropriate sections after discussion with the farming community.

Attendance and wish to be heard at hearing(s)

I/We do wish to be heard in support of my/our submission

[Note: This means that you wish to speak in support of your submission at the hearing(s).]

If others make a similar submission, I will consider presenting a joint case with them at a hearing.



Signature:

Date: **October 9, 2015, 15:00hrs.**

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission] Signed on behalf of SWI for Don Bell by Ray Stewart.

Ray & Karen Stewart

'Bag End', Upperplainshire,

611A, Upper Plain Road, RD 8, Masterton, 5888, New Zealand.

Telephone: (64-6) 3788681. Mobile: 027 2499242.

Email: ray@bagend.nz

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including **your name and address for service** as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region

This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

To:
Freepost 3156
Wellington Regional Council
PO Box 11646
Wellington 6142

Your details

Full name: **Don Bell (Sustainable Wairarapa Inc Convenor)**

Organisation name (if applicable): **Sustainable Wairarapa Inc**

Address for service:
**114 Cornwall Street
Masterton 5810**

Telephone no's:
Work: **027 555 2885**
Home: **06 377 1884**
Cell: **027 555 2885**

Contact person: **Don Bell, Convenor, Sustainable Wairarapa Inc**

Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email.

We will send you updates on the process, information and provide you with details of any meetings and the hearing.

Email address: bellhouse@xtra.co.nz; ray@bagend.nz

Trade competition

I/we **could not** gain an advantage in trade competition through this submission *[If you ticked this box, delete the rest of this section and go straight to 'Your submission']*

I/we are **not** directly affected by an effect of the subject matter of my submission that adversely affects the environment, and does not relate to trade competition or the effects of trade competition.

Your submission

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

Sustainable Wairarapa Inc (SWI) submission on GWRC's Proposed Natural Resource Plan.

SWI general:

- **3.6, 4.5:** Wetland (current) restoration management plans – how is progress being measured? Are wetland restoration plans incorporated into flood management plans? Is there provision to restore/recreate wetlands?
- **3.6, 4.5:** Does the plan ensure that all remaining wetland habitats are protected as s6(c) RMA habitats?
- **3.13, 4.4, 4.5, 4.6:** While DOC is responsible for marine reserves, how can GWRC work with DOC to identify and coordinate these within the plan? What are the rules for estuaries?
- **3.13, 4.4, 4.5, 4.6:** A point has been made with regard to coastal areas and how the NZCPS refers specifically to the coastal environment which has broad implications for the wider coastal environment, but GWRC's Proposed NRP uses only coastal marine areas which has a much more narrow definition. Is the NRP required to give effect to the NZCPS and does GWRC feel it has done so? The question of motor vehicles on foreshores has also been raised.
- **3.8, 4.7:** Masterton's Air Quality 'plan' was authorised a few weeks ago, but given the overlap with MDC how do GWRC propose to ensure MDC meet the 2020 deadline?
- **3.6, 4.8:** Stormwater issues are an important consideration in MDC's flood control plans; how has GWRC addressed this in their flood plan options for Masterton?
- **3.4:** While GWRC has a separate climate change Strategy how has climate change been incorporated in the environmental management outcomes of the NRP?
- **3, 4:** There are many open-ended timelines in this document; noting that the NRP is 'technically' (the current plan is into its seventeenth year) a ten year plan, nonetheless progressive timeline objectives, regular review dates and/or fixed dates need to be added.
- **3, 4:** It has been suggested that Forest & Bird's submission on the National Environmental Standard on Plantation Forestry be appended to GWRC's proposed natural resource plan as it raises in that context erosion risks and consequences, sedimentation and water quality, coastal environment, wetlands, riparian vegetation and SNA's, native fish, native fauna, wilding conifers, genetically modified organisms, etc. (A copy can be forwarded if required.)
- **3.5, 4.8:** How is GWRC going to ensure that the freshwater objectives are met? There is nothing in the plan that ensures the freshwater objectives can be met, e.g. in the form of a resource consent. This is of particular concern to cumulative impacts of agriculture rather than point source discharge.
- **4.8:** How does GWRC intend to achieve the PNRP Freshwater Objectives, given the apparent lack of any provisions to ensure that farming in the region is sustainably managed?
- **3.6, 4.5:** Why does the plan not include key freshwater parameters to provide for life supporting capacity and ecosystem health, including DIN and DRP, dissolved oxygen, deposited sediment, or natural character (NCI)? Why was the list originally proposed to be included in the plan subsequently removed?
- **4.1:** How has it been determined that the provisions in the BRL (beds of rivers and lakes) section of the plan are the most efficient and effective means of achieving the plans objectives, given that no section 32 analysis has been undertaken for the BRL sections?
- **3.6, 4.5:** Does the plan ensure that minimum flows, and core allocations safeguard the life supporting capacity, ecological processes, and natural character (hydrological regime) of

freshwater and freshwater habitats? The core allocation of 50% MALF (mean annual low flow) is of concern especially as many of the Wairarapa rivers flow at low flow for prolonged periods of time (flat-lining occurs).

- **3.6, 4.2:** Does the plan ensure that rivers are sustainably managed by flood protection and river management activities? How does the plan ensure that the natural character of rivers in relation to their form and function are protected?

Provision Code Number: 1.1

Title: Overview of the Wellington Region

Reason for Feedback: Table 1.1: values: Why the focus on water? What about the values associated with the other forms of natural capital?

Changes Sought: *Include and revise tables to identify values associated with soil and minerals, biodiversity, the atmosphere*

1.4.2

Identifying issues – community views, scientific and technical information

Recognise the value of "human capital" - see "Growing for Good" - the knowledge skills, competencies and attributes of community residents. Ensure they receive an appropriate formal status.

Give formal status to people with local knowledge, expertise, competencies etc when considering submissions to plans and consent applications

2.2.78

Drain

I note reference to "Tile drains" in some sections

There are various forms of sub-surface drains which need better definition. The plan is silent on discharge from tile drains; are they a 'point source' discharge? Is sediment as well as nutrients assessed as part of the discharge from tile drains? There is a need to work with the community to raise awareness and establish good practice to mitigate effects of tile drains.

5.4.3

LW.R92

Rule LW.R92: Access to the beds of Category 3 surface water bodies by livestock – permitted activity
Land managers need clarity in order to decide which rule(s) apply to their particular streams and wetlands.

A landowner risks wrongly identifying the rule(s) which apply to their particular surface water bodies - it is very difficult having to wade through the definitions, whether ephemeral or outstanding, what category, mana whenua value (what iwi) schedules, maps, websites etc. and be sure you have it correct

Consider including table(s) which name streams and wetlands (or parts thereof) and listing which rule(s) apply

LW.R94

Rule LW.R94: Access, up until seven years after the date of notification of this plan as proposed, to the beds of Category 2 surface water bodies by cattle (including dairy cows), farmed deer and farmed pigs – permitted activity

There is a long introductory period before Rule LW R94 applies. In some cases this is allowing landowners to continue with bad practices. Where communities have invested much time and money in stream restoration projects, such activities jeopardise the investment downstream.

Provide for communities to apply for a special category to be granted to restoration projects. Make provision for the effects of stock access to be controlled as for Rules LWR97 and 98

5.5.3 LW.R111: Reclamation of outstanding natural wetlands – prohibited activity

Amend

This rule has a condition to meet the general conditions for wetlands. The conditions do not take into account the fact that there are a number of large wetlands within the Wairarapa Moana space and so the requirement to remove machinery every night is impractical when the machinery may have to be moved more than a kilometre.

Make provision for machinery to be parked on elevated ground within the wetland overnight.

Accepted that this could be worked into a restoration and management plan

5.5.3 LW.R104: Structures in natural wetlands and significant natural wetlands – permitted activity

Amend

The rule only allows hand held machinery to be used. Again within some of the larger wetlands this is not practical.

Make provision for machinery to be utilised where there are existing access tracks within both large and small sized wetlands. Can a stop bank be removed under this permitted rule?

5.5.3 LW.R105: Planting and pest plant control in natural wetlands, significant natural wetlands and outstanding natural wetlands – permitted activity

Amend

In any large scale planting jobs machinery may be the most practical option.

Allow the use of machinery on large scale planting jobs.

5.5.3 LW.R106: Restoration of natural wetlands, significant natural wetlands and outstanding natural wetlands – controlled activity

Amend

The current requirement for land owners to fund resource consent for restoration purposes is a deterrent to the landowners becoming active in restoration projects on their property.

Strongly support the waiver of resource consent fees – linked to all plans.

5.5.3 LW.R106: Restoration of natural wetlands, significant natural wetlands and outstanding natural wetlands – controlled activity

Amend

Restoration management plans will take some years to be introduced to the Wairarapa Moana wetland owners.

I'd like to see a transitional arrangement in the interim. For example, the initial phase of the Freshstart for Freshwater Cleanup Fund is winding down however there are still works to be completed within significant wetlands. A requirement to develop a restoration and management plan will significantly delay these works.

5.5.3 LW.R107: Activities in natural wetlands and significant natural wetlands – discretionary activity

Amend

As for rule 106 plus the ability to waive resource consent fees.

Transitional arrangement plus the use of waiving resource consent fees to encourage restoration of wetlands.

5.5.3 LW.R108: Activities in natural wetlands and significant natural wetlands – non-complying activity

Amend as for Rule 107

5.5.3 LW.R109: Activities in outstanding natural wetlands – discretionary activity

Amend as for Rule 107

5.5.3 LW.R110: Activities in outstanding natural wetlands – non-complying activity

Amend as for Rule 107

5.5.3 LW.R111: Reclamation of outstanding natural wetlands – prohibited activity

Amend as for Rule 107

5.5.5 LW.R121: Maintenance of drains – permitted activity

Amend

The rule as written is impractical. Drains or long wetlands can be wide or narrow, gravel or sand based, fenced off, have a developed riparian margin, have no riparian margin, have noxious plants in abundance, have a steep or gentle batter slope, are part of a pumped or gravity drainage system sometimes closed from the downstream catchment and are therefore maintained for a variety of reasons. Within the Wairarapa Moana catchment the network is extensive exceeding 1300 kilometres in length. The rules as currently written provide one prescription for the maintenance of this extremely diverse drainage network and they stifle innovative solutions to their management.

1. Amend section f to allow drains to be changed from the classic U shape to a V or benched batter slope.

2. Amend section g. The following is a comment from a farmer "A slotted bucket will let some of the eels get back in to the water but also a percentage of the material that you are trying to get out.

Meaning a larger amount of silt falling back in the water requiring a second attempt to remove it.

Slotted buckets by their design are much weaker and require more maintenance

Many contractors use a standard wide bucket with large circular holes on the back and sides of the bucket what is wrong with this.

I'm not sure about the price of a weed bucket but \$5000 sounds about right as you have to get them made you cannot buy them off the shelf.

HireMax said to me they would sell me a standard wide bucket and they could modify it to whatever I wanted."

3. Amend section h attached comment from a farmer "If I see a FISH in a bucket full I lift out, I stop and put it back in the water straight away if I wait an hour it will be dead

If I see a perch, rudd, goldfish, tench, etc, etc do I get brownie points for everyone I leave out of the water.

Many eels don't come out of the mud or weed within an hour I usually walk back up the cleanings every couple of hours when I have a break.

If I see an eel heading off in the wrong direction from a bucket of cleanings I usually stop and chuck it back in the water at the time.

(It will only be a matter of time before we are required to have someone walk behind a digger sorting out what comes out of the drain)

I try to put the cleanings in a position that naturally lets them find their own way back in the water.

In the middle of summer an eel out in the sun might not last an hour.

During spring, autumn, and winter or if the ground is wet they can last for days. "

4. Amend section j again a comment from a farmer "Many drains are only as wide as a bucket on a digger so how do you clean only one third of it.

There are dozens of different types of drains all requiring a different approach." "I don't always carry around a weed bucket in my back pocket (about 1 and a half tons) so if I am going from one part of my farm to another with my wide bucket on, (which I usually do) and see something blocking the creek, a branch of willow, or a big clump of weed I would take it out as I go past, so what's wrong with that." There needs to be a reference to the scale of the maintenance relative to the drainage network within a landowner's property. Over the years there have been a small number of operators

who have been found to have killed native fish perhaps it needs to be recognised that 80% or perhaps more are diligent operators who care about the environment.

5. Amend section k again a responsible farmer responds "The most confusing thing I notice is that they say start work from upstream working down but if you do that you cannot see what you are doing because the water is cloudy so you will miss some areas or will have to take several buckets full to check that you have got it all."

6. Allow the placement of sediment traps, rocks (to increase diversity in fish habitat), and drums for the same purpose. In time there could be the creation of such fish "shelters" throughout the drainage network reducing prescriptive rules.

7. Consider carefully the guidelines/code of practise developed by Environment Canterbury which allows flexibility dependant on the conditions on site.

5.5.5 LW.R122: Removing vegetation – permitted activity

Amend

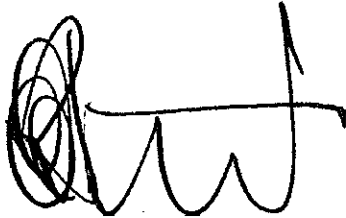
As for rule 121 there are issues regarding practicality regarding bucket type, return of native fish. Amend the appropriate sections after discussion with the farming community.

Attendance and wish to be heard at hearing(s)

I/We do wish to be heard in support of my/our submission

[Note: This means that you wish to speak in support of your submission at the hearing(s).]

If others make a similar submission, I will consider presenting a joint case with them at a hearing.



Signature:

Date: **October 9, 2015, 15:00hrs.**

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission] Signed on behalf of SWI for Don Bell by Ray Stewart.

Ray & Karen Stewart

'Bag End', Upperplainshire,

611A, Upper Plain Road, RD 8, Masterton, 5888, New Zealand.

Telephone: (64-6) 3788681. Mobile: 027 2499242.

Email: ray@bagend.nz

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including **your name and address for service** as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.