Submission on the Proposed Natural Resources Plan for the Wellington Region

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:

INSTRUCTIONS

Send to: regionalplan@gw.govt.nz

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Trade competition

Yes I/we **could not** gain an advantage in trade competition through this submission

No I/we **could** gain an advantage in trade competition through this submission.

If you could gain an advantage please complete one of the following:

I/we **are** 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.

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.

Attendance and wish to be heard at hearing(s)

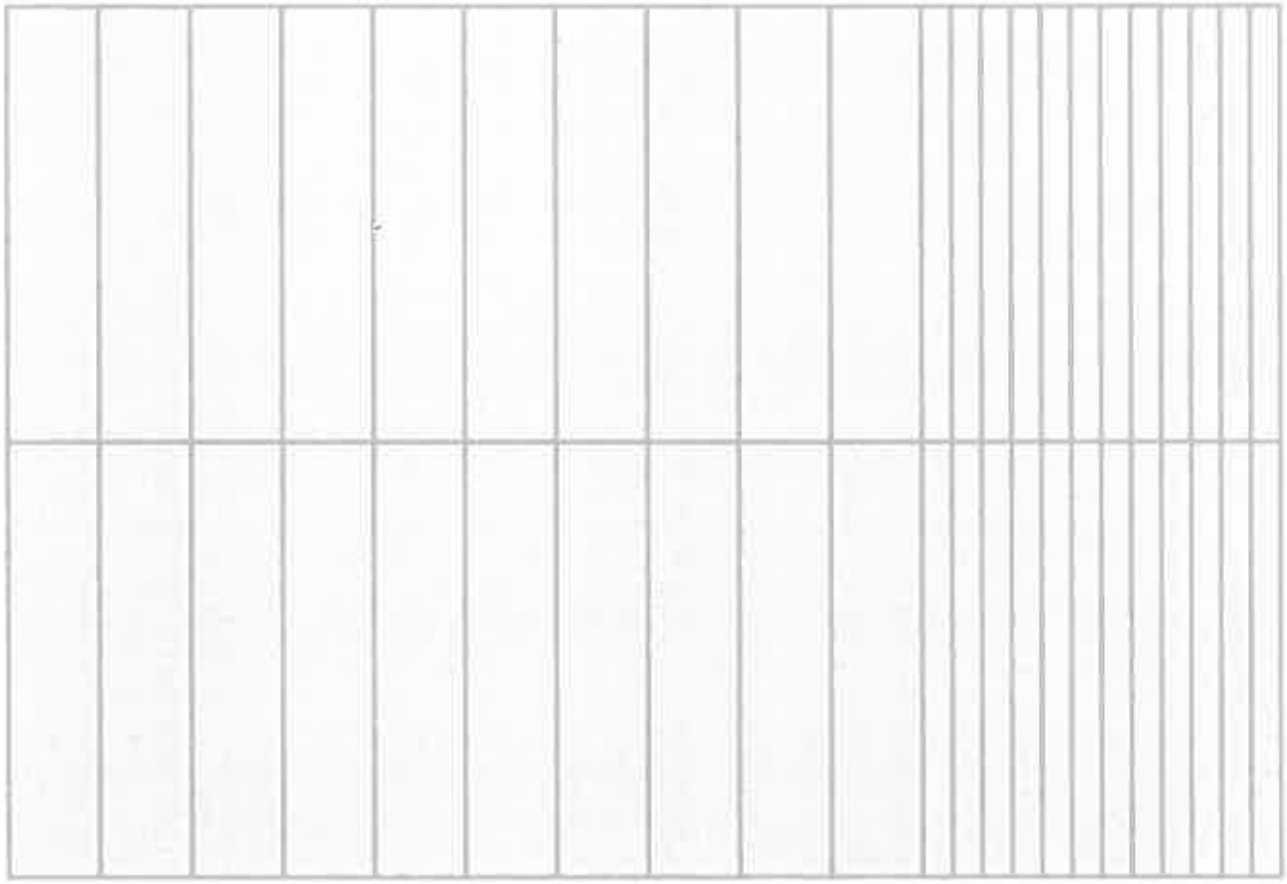
No I/we do wish to be heard in support of my/your submission

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

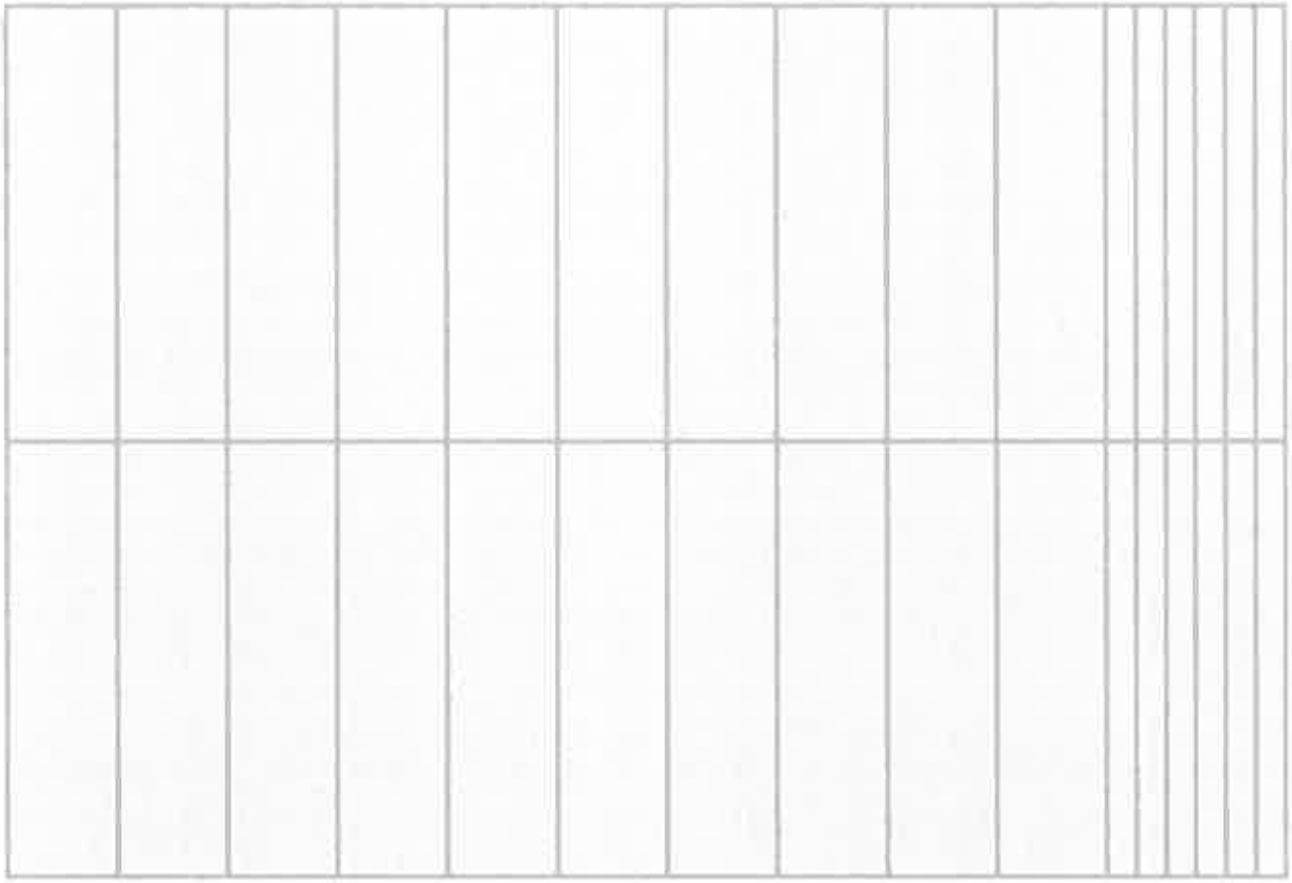
Yes	I/we do not wish to be heard in support of my/our submission [Note: this means that you cannot speak at the hearing. However, you will still retain your right to appeal any decision made by the Wellington Regional Council to the Environment Court.]
No	If other make a similar submission, I will consider presenting a joint case with them at a hearing.

Date:

Interpretation	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Plantation forestry harvesting	Amend	Inconsistency with National Environmental Standards for Plantation Forestry (NESPF)	The defintion should be aligned within NESPF so it should be considered as plantation forestry an area of at least 1 ha
Erosion prone land	Amend	More stringent than the current plan and consistency with National Envionmental Standards for Plantation Forestry (NESPF). In the current plan for GWRC the slope for permitted activity is 23 degrees and 28 degrees depending on the area of the region. What is the rationale to make this slope more stringent? Furthermore, if NESPF comes into force later next year, they have set up a maximum slope of 25 degrees for a permitted activity, apart from taking into account other attributes such as soil and rock base (among others)	Keep the erosion prone land definition as it was in the previous plan ("any land within Area 1 with a slope of greater than 23 degrees; and any land within Area 2 with a slope of greater than 28 degrees") or otherwise use the erosion susceptibility classification contained in NESPF



Policies	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Policy P7: Uses of land and water	Amend	Forestry delivers a wide range of benefits including improving water quality, erosion control, carbon sequestration and employment.	Include Forestry as beneficial use of land and water resources.



Rules - Air quality	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Rule R36: Agrichemicals – permitted activity	Amend	g) Prepare a spray plan at least once per annum. That should be required only within sensitive areas and large operations.	Change the rule and require the plan to state dependance on the scale and environmental values of the operation

Rules - Discharges to water	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Rule R42: Minor discharges – permitted activity	Amend	A suspended solids limit of 50 and 100 g/m3 is a very low and impractical limit and not easily measurable.	Avoid any reference of suspended solids limit.

Rules - Land use	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Rule R99: Earthworks– permitted activity	Amend	The rule sets up 3,000m2 per property per 12 month period. Currently this is 1,000 m3 of soil within any 10,000 m2 per 12 month period. What is the rationale to make it more stringent?	Keep it as it was in the previous plan or align it with NESPF rule for earthworks. Leave the quantity of earthworks as they are now by requiring an erosion and sediment control plan on erosion prone land and available to the council on request (as NESPF)
Rule R101: Earthworks and vegetation clearance – discretionary activity	Amend	As rule 100 is only for vegetation clearance that is on erosion prone land and rule 101 says that "vegetation clearance that is not permitted by Rule 99 or R100 is a discretionary activity, what happens with vegetation clearance on non-erosion prone land? The intention of these rules (R99,100,101) is not clear as vegetation clearance that is not on erosion prone land will be under rule 101 which will require a consent.	It needs to be clarified and re-worded.
Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Support	Is good to have a rule that includes plantation forestry activities. We find the provision of a permitted activity on erosion prone land yet plantation forestry harvesting as immediately a controlled activity principally wrong.	Provision of permitted activity for plantation forestry harvesting.
Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Not stated	Rule 102 allows plantation forestry harvesting on erosion prone land following conditions and Rule 103 says that plantation forestry harvesting that is not permitted under rule 102 is a controlled activity. What is it when plantation forestry harvesting is on a NON erosion prone land?	Rule 102 A. Plantation forestry harvesting Rule 102 B. Plantation forestry harvesting on erosion prone land Rule 102A should be more permissive (without requiring a complex harvest plan as well as detailed erosion/sediment control plan) Rule 102B will require an erosion and sediment control plan (as the harvesting is on erosion prone land) available to the council on request.

Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Amend	The rule sets that a harvest plan shall be prepared and submitted to the council 20 working days prior to the plantation forestry harvesting. This condition is impractical within small scale and low complexity operations. Is not logical to plan and submit a harvest plan within 20 working days under a permitted activity opeartion as this time becomes a resource consent process time. Having this time of notification doesn't give any flexibility to operate under a permitted activity. Submitting a harvest plan withing 20 working days has to be required only for larger operations (more than 10 ha) and non permitted activities.	Avoid the submission of a harvest plan and reduce the notification time: a) for small scale, low complexity and slope <25 degrees permitted activities, 48 hours (it will be under Rule 102A). b) for permitted activities on slopes >25 degrees (erosion prone land) 7 days (it will be for Rule 102B). c) rest of operations cataloged as non permitted activities, 20 working days (this will be Rule 103)
Rule R102: Plantation forestry harvesting on erosion prone land – permitted activity	Amend	condition c) "slash is removed from a surface water body where it is blocking river flow or is diverting river flow and causing bank erosion". That condition will be never complied with as it is impossible to remove all the slash from a waterbody post harvest. Part of the slash sometimes will remain in the water body but it doesn't mean that it will cause diversion, blockage or bank erosion.	condition c) "whenever safe and practicable to do so, remove pontentially unstable slash that has the potential to block or dam a stream flow or divert flow into stream banks in a way that is likely to cause erosion."

Rules - Wetlands and beds of lakes and rivers	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
Rule R104: Structures in natural wetlands and significant natural wetlands – permitted activity	Not stated	There is no rule for plantation forestry harvesting as a permitted activity on or around natural wetlands. This rule (R104) is only applicable for hunting and recreational purposes. There are temporary activities such as crossing upper reaches of wetlands using corduroy logs or supportive material to facilitate harvesting which should be allowable under a permitted activity subject to certain practical conditions.	Have a harvesting permitted activity rule for natural wetlands.
Rule R104: Structures in natural wetlands and significant natural wetlands – permitted activity	Amend	General conditions for wetlands. As logs are by definition "contaminants" the condition a) restrict the use of logs as corduroy in a crossing. As part of the permitted activity it should be allowed to use logs as a corduroy for a temporary crossing on natural wetlands provided it is removed after harvesting operations.	Allow logs for corduroy temporary crossings on natural wetlands.
Beds of lakes and rivers general conditions	Amend	Inconsistency with National Environmental Standards for Plantation Forestry (NESPF). Condition c) stipulates that "all machinery, equipment and materials used for the activity shall be removed from the river or lake bed every night...". NESPF general conditions for crossings estates "... all excess construction materials and equipment are removed from the bed of the water body within five working days"	Reword the condition as "...shall be removed from the river or lake within five working days" to be aligned within NESPF.
Rule R104: Structures in natural wetlands and significant natural wetlands – permitted activity	Amend	General conditions for wetlands. As logs are by definition "contaminants" the condition a) restrict the use of logs as corduroy in a crossing. As part of the permitted activity it should be allowed to use logs as a corduroy for a temporary crossing on natural wetlands provided it is removed after harvesting operations. The definition of natural wetlands has lead to the submission on this rule as oposed to a temporary crossing across a river/stream.	Allow logs for corduroy temporary crossings on natural wetlands.
Rule R114: River crossing structures – permitted activity	Not stated	What about temporary structures/crossings?	Include temporary crossings specific conditions as when the material needs to be removed and that erosion and sediment controls are installed

Rule R115: Culverts – permitted activity	Amend	Condition (x) stipulates that a minimum culvert installation depth below the bed of 20% of the width of the culvert. NESPF stipulates "... culvert invert is at least 100 mm below the	Reconsider the rule to be aligned with NESPF rule for river crossings/single culverts.

Maps	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
			Make free and downloadable all the layers that are included in the GW GIS viewer.