

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

Victoria Lamb

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

Beef + Lamb New Zealand Ltd (Beef+Lamb NZ)

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

Level 4 Wellington Chambers
154 Featherston Street
Wellington 6011

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Wellington 6140

PHONE

04 474 0806

FAX

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victoria.lamb@beeflambnz.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.

Beef + Lamb NZ is an industry-good body funded through a levy under the Commodities Levy Act and represents the interests of sheep and beef farmers in the Greater Wellington Region.

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: Victoria Lamb

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.

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...
Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council	S85/079	Support	Support all of this submission point	Use of agrichemicals by councils is necessary for biosecurity purposes	Amend as proposed.
Horticulture NZ	S307/61	Support	Support all of submission point	Disposal of Unwanted Organisms, including in a declared emergency is crucial to the protection of the primary sector	Amend as proposed
Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council	S85/012	Support	All of submission point	The plan should describe the outcome to be achieved not prescribe the inputs or particular actions that may or may not have a relevant outcome.	Amend as proposed.
Horticulture NZ	S307/65	Support	All of submission point	Ability to respond to biosecurity risks in a timely way is crucial to protection of the primary sector, for public health, environmental protection	Amend as proposed
Minister of Conservation	S75/115, 116, 117, 118	Support	All of submission points	Ability to control environmental pest plants and pest animals by agencies in a timely way is a significant part of a successful programme	Amend as proposed

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council	S85/080	Support	All	Use of agrichemicals for biosecurity purposes by agencies needs to be enabled as much as possible, whilst protecting other values	Amend as proposed
Horticulture NZ	S307/064	Support	All	Clarity of elements for discretion	Amend as proposed
Greater Wellington Regional Council	S133/009	Oppose in part	Potential for the amendment to restrict the ability to use agrichemicals for pest control when applied as required by EPA or other controlling agency, for the purposes they are intended for e.g. pest control.	Agrichemicals for pest control, particularly for biosecurity purposes by agencies need to be enabled.	Amend to ensure that agrichemicals for biosecurity purposes including pest plant and pest animal control are not prevented.
Carterton District Council	S301/058	Support	All	The meaning of this is not clear and needs to be reworded to avoid confusion.	Amend to clarify the intention here subject to the next item.
Masterton District Council South Wairarapa District Council	S367/107 S366/107	Support	All	If work is ongoing then water races must be permitted to continue until the outcomes of the Water Race Working Group are known.	Amend as proposed.
Fish & Game	S308/089	Oppose	All	This will prohibit any land use for any primary production including forestry, Manuka growing, domestic vegetable patches, flower gardens, compost bins or any use that may result in nutrient loss to water directly or indirectly.	Decline the proposed amendment.
Federated Farmers of New Zealand	S352/191	Support in part	Except for (a) which specifies a single limit which may or may not be appropriate to the level of risk of adverse impact, deletion of clause (e)	Draft rule is arbitrary in its setting of numeric limits, and is an input control, rather than a way of addressing impacts in proportion to their size. There needs to be science to support any numeric limits. (e) provides a flexible	Amend all clauses to provide for conditions which reflect the level of risk to the environment of any particular activity. Focus on outcomes to be achieved and leave it up to the land user to determine the most appropriate means.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
				approach based on risk to the environment.	
Regional Public health	S136/012	Support in part	Support the changing of the numeric limits included	It would seem that there is no science to back the numeric limits proposed if Regional Public Health consider them too high. Limits should be scientifically based and reflect the actual level of risk, not an arbitrary number.	Amend the rule to reflect the outcome that must be achieved, that reflects science to support any numeric limits determined.
Federated Farmers of New Zealand	S352/193	Support in part	Support the changing of the numeric limits being imposed.	As above, there needs to be science to support the numbers, reflecting the level of risk to the environment. (a), (b) and (c) would seem to be adequate in covering volume to be discharged, as discharge area will affect the risk of discharge to water.	
Regional Public health	S136/013	Support in part	Support the changing of the numeric limits included	It would seem that there is no science to back the numeric limits proposed if Regional Public Health consider them too high. Limits should be scientifically based and reflect the actual level of risk, not an arbitrary number.	Amend the rule to reflect the outcome that must be achieved, that reflects science to support any numeric limits determined.
Masterton District Council	S367/113	Support	All	Draft rule is unnecessarily prescriptive and prevents innovation that may result in environmentally better outcomes. Focus should be on achieving environmental outcomes not restricting the means and methods used to achieve the outcomes.	Amend as requested by submitter.
South Wairarapa District Council	S366/114	Support	All	As for previous item	Amend as requested by submitter

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Horticulture NZ	S306/067	Support	All	Referencing the Code of Practice means that practices may be updated as better knowledge and technology becomes available. e.g. drones may make piloted aircraft inappropriate in some circumstances, and such an innovation should not be prohibited because rules were too prescriptive instead of being focused on outcomes to be achieved.	Amend as requested by submitter
Waa Rata Estate	S152/066	Support	All	Clarify that clause (d) does not potentially capture sheep and goat milking facilities, stock yards, woolsheds and a range of innocuous holding facilities on farms that have low to nil risk from the spreading of animal effluent as defined in the plan. Being prescriptive rather than outcome focused limits and constrains low risk activities.	Amend to exclude low risk activities and focus on outcomes to be achieved not prescriptive rules.
A J Barton	S365/095	Support in part	Some operations do not require effluent storage. Adopt an effects based approach.	Sheep and goat milking do not need mandatory storage but are covered by (a) dairy farms.	Amend to exclude dairy farms that do not need effluent storage e.g. goats, sheep.
Fertiliser Association NZ	S302/060	Support in part	Deletion of clause (c).	As written this would appear to include all land including urban gardens and lifestyle blocks as well as rural land	Amend or delete clause (c)
DOC	S75/137	Support	All	Ability to apply vertebrate toxic agents over or into water is required for biosecurity purposes, and the EPA requirements should be sufficient in determining appropriate controls around use, without other prescriptive and possibly conflicting arbitrary rules be introduced.	Insert new rule as requested.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
DOC	S75/135	Support	Deletion of clauses (b) and (c)	EPA approvals should be sufficient and introducing additional rules risks conflicting direction being given as well as inappropriate conditions.	Delete (b) and (c)
DOC	S75/136	Support	All	Provision is required for VTAs to be discharged to water for biosecurity reasons e.g. pest fish removal	Amend as requested by submitter
Fish & Game	S308/093	Support in part	Inclusion of the outcome to be achieved "shall not result in discharges entering water either directly or indirectly"	Rules should be about outcomes to be achieved, effects based and not prescriptive with very specific rules that may or may not be appropriate in all situations e.g distance from a water body, depth, area, soils etc.	Include outcome suggested by submitter, and remove clauses specifying numeric rules on size, depth, location etc and allow land managers to be responsible for meeting the outcome required and managing effects relevant to the circumstances.
James Falloon	S376/020	Support	All	Requirement should be to manage effects and to achieve outcomes. Rules need to be based on science not convenience e.g separation distance, soil types etc. and appropriate to the specific conditions.	Amend as requested by submitter
Fish & Game	S308/095	Support in part	Support inclusion of "shall not result in discharges entering water either directly or indirectly"	Focus should be on outcomes and managing real effects, not inputs.	Include outcome statement of submitter and delete prescriptive and numeric rules (b), (c), (d), (g). Include in non-statutory guidance or methods.
Masterton District Council	S367/117	Support	All	Rules should be effects based and outcome focussed not prescriptive	As requested by submitter
Horticulture NZ	S307/069	Support	All	Consent level should reflect level of actual risk from activities.	As requested by submitter
Horticulture NZ	S307/070	Support	All	Rules should be effects based and outcomes focused	As requested by submitter

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Horticulture NZ	S307/071	Support	All	Consent level should reflect level of risk from activities	As requested by submitter
Royal Forest and Bird Society	S353/136	Support in part	Support the approach that allows activities provided good management is being practiced, and which focuses on achieving outcomes for water quality.	Rules should be about managing actual impacts and achieving outcomes.	Include the outcome focused approach or similar, and remove the prescriptive rules to methods, guidelines and good practice. Stock exclusion should follow that developed through the Land and Water Forum for consistency, unless specific reasons require deviation.
Horticulture NZ	S307/072	Support	All	Biosecurity is critical to the primary sector.	As requested by the submitter
Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council	S85/022	Support	All	Definition of erosion prone needs to be clear.	As requested by submitter
Federated Farmers of New Zealand	S352/209	Support	All	Definitions or erosion prone etc are too broad and do not reflect levels of risk, or the focus on achieving outcomes.	As requested by submitter.
Dairy NZ and Fonterra Co-operative Group Ltd	S316/112	Support	All	Fencing of wetlands to exclude stock should be a permitted activity	As requested by submitter
Horticulture NZ	S307/073	Support in part	Requirement for all pest plants in an RPMS or UOs to be removed	Biosecurity removals should include all risk organisms, However, inappropriate plants that are not in an RPMS or UOs should also be able to be removed e.g. exotic species, indigenous species outside the natural range.	Amend as requested by submitter. Add in provision to remove other inappropriate plant species.
Mahaki Holdings Ltd	S370/094	Support	Support deletion of clauses	Aerial spraying may in some circumstances be appropriate depending on the pest to be controlled, and other options than only hand held machinery may also be applicable e.g boats on open	Delete clauses as requested by submitter, or amend to make suitable provision for other options for control. Focus on outcomes not inputs.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
				water for the control of aquatic pest plants	
Waa Rata Estate	S152/080	Support and amend	As submitted	GW as the only arbiter of suitability of restoration plans is too restrictive – there are many others with equally good or better credentials.	Include others with appropriate credentials in the approval of restoration plans.
Environmental Defence Society	S110/014	Oppose	Removal of provision for stock in a wetland	Stock e.g. sheep, may be an essential management tool within wetlands to reduce plant densities, control fire risk and for other management purposes	Retain existing provision relating to stock in wetlands
Environmental Defence Society	S110/015	Oppose	Reject change requested.	Restoration of wetlands should be enabled not hindered.	Reject submission
Royal Forest and Bird Protection Society	S353/144	Oppose	Reject change requested	Indigenous species can be inappropriate e.g. where species are out of their natural range such as pohutukawas. Their removal should be supported.	Reject submission
Rangitane o Wairarapa Inc	S279/198	Support in part	Oppose retention of (j) as written.	Small dams and ponding should be acceptable where they are part of a restoration programme	Amend (j) to provide for these where they are part of an agreed restoration plan.
Masterton District Council Carterton District Council	S367/125 S301/065	Support	Support the development of practical outcome focused actions not prescriptive rules	This is a work in progress and prescriptive rules should not be introduced prior to the results of the working group.	As requested by submitters.
Horticulture NZ	S307/074	Support	All	Biosecurity purposes must be enabled	As requested by submitters.
Carterton District Council	S301/066	Support	All	Prescriptive rules are counter-productive in achieving good outcomes. Several prescriptive rules included are not appropriate in many cases and may be creating adverse environmental effects because they are inappropriate.	As requested by submitters

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
DairyNZ and Fonterra	S316/123	Support	All	Rights to stock water under the RMA cannot be abrogated by rules in a Plan – clarification that this is not intended is needed. RMA section reference is incorrect	As requested by the submitters
Federated Farmers of New Zealand	S352/235	Oppose in part	“(b) the total take shall be no more than 70L per day per stock unit”	The 70L per stock unit should be 70L per head for dairy cattle. 70L per stock unit would amount to 560L per head. 70L is the generally used volume for washdown and cooling water. Horizons Regional Council researched this as part of their plan processes.	Amend to read “the total take shall be no more that 70L per day per dairy cow, ...”
DairyNZ and Fonterra	S316/126	Support	All	Rights to stock water under the RMA cannot be abrogated by rules in a Plan – clarification that this is not intended is needed. RMA section reference is incorrect	As requested by the submitters
Federated Farmers of New Zealand	S352/326	Support	All	Flexible temporary transfer where needed will enhance efficiency of use	As requested by submitters
Federated Farmers of New Zealand	S352/345	Support	All	Additions are important to recognise all of the well beings. Transfers should be enabled to facilitate most productive use of water. Trading has a different meaning.	As requested by submitters

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