

Proposed Natural Resources Plan:

Submitter:

**Wainuiomata Rural Community  
Association**

Submitter Number:

**S164**



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

Or email: regionalplan@gw.govt.nz

### Your details

Full name: Michele Caldwell  
 Organisation name: (If applicable) Wainuiomata Rural Community Association  
 Address for Service: 1248 Coast Road, RD, Wainuiomata,, Lower Hutt

Telephone no's: Work: Home: 04 564 4288 Cell: 0276 944 611  
 Contact person: Margot Fry

Address and telephone no (if different from above): Note: please send any communication to Michelle Caldwell, at the email address listed below.

### 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. Please tick here  if you do not agree to receive communication via email.

Email address: Michelle Caldwell <polwarthsheep@xtra.co.nz>

### Trade competition

I/we could not gain an advantage in trade competition through this submission. [Go straight to **Your Submission**]

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.

### Your submission

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

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  Schedule F1	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	Schedule F1, at page 361 ff, includes the GIS coordinates of 10 number? of streams and tributaries along the Wainuiomata Valley. This is not the easiest way for our members to identify where these streams are so that landowners may have to be mindful of their responsibilities
	I seek the following decision from WRC (give precise details): →	To ensure greater clarity, we suggest that either: a) the streams and tributaries be named, either by the common name or the name given by the property owner; or b) the streams and tributaries of each river system be mapped

		separately so land owners can clearly identify which ones are on their property; or c) the table notes the property titles that the streams and tributaries are located on, again for ease of identification.
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The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  Rule 42 Minor Discharges- permitted activity (p 116)	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	We consider the concentrations of total suspended solids, as outlined in clause (b) (ii) and depending on what the contaminant is, could either be too much or too little.
	I seek the following decision from WRC (give precise details): →	We suggest that "contaminant" is defined. At present, "contaminated land" is defined as is "hazardous substances". However it is unclear whether contaminant is a separate category. We also recommend that evidence be provided as to why these particular measures (50 g/m3 and 100g/m3) have been chosen and suggest that a sliding scale would be more effective.

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

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  Rule 70- clean fill material – permitted activity (p 128)	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	We suggest that it be clarified whether this rule pertains to the removal of flood debris. T
	I seek the following decision from WRC (give precise details): →	This could be clarified in the definition of clean fill material. The current definition includes clay, soil and rock. We suggest the definition specifically excludes "river gravels" to avoid confusion. We also suggest that it be made clear whether amount of clean fill material that can be discharged under this rule is an annual amount.

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

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  Rule 75- new or upgraded on site wastewater systems- permitted activities (p 132)	My submission on this provision is: →	<input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	We wish to note our approval of the new section (e) which provides for a discharge from a new or upgraded on site waste water system to be 20m from the boundary of the property rather than the previous 50m. We consider this will be very helpful for landowners who wish to build on narrow properties such as, for example, are found in Moore's Moores Valley.
	I seek the following decision from WRC (give precise details): →	

If you have more submissions you wish to make, please find more boxes at the bottom of this document

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

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]

## 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.

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

<p>The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):</p>	<p>My submission on this provision is: →</p>	<p><input type="checkbox"/> I support the provision  <input checked="" type="checkbox"/> I oppose the provision  <input type="checkbox"/> I wish to have the specific provision amended</p>
<p>Rule 82- Application of fertiliser from ground based or aerial applications- permitted activity (p 142)</p>	<p>Reasons for my submission: →</p>	<p>We consider this rule, as it is currently stated, will be impractical to implement. Despite best endeavours, it is almost impossible to prevent fertiliser, whether applied from a ground based or aerial application, from entering either a water body or to move beyond the property boundary.</p>
	<p>I seek the following decision from WRC (give precise details): →</p>	<p>We believe it is important to ensure that fertiliser application is done according to best practise so recommend that sub clause (a) is replaced by sub clause (b) from Rule 20 in the previous draft.  This would mean that the sub clause in Rule 82 in the current draft:  (a) The discharge is not onto or into a surface water body or beyond the boundary of the property including as a result of wind drift would be changed to sub clause (b) in Rule 20 from the Greater Wellington Regional Plan: Working document for discussion:  (b) best management practices shall be undertaken to prevent the discharge of fertiliser into any surface water body including, but not limited to, fertiliser entering a surface water body as a result of wind drift</p> <p>We believe that this would address the core issue and encourage the behaviour change that is being sought.</p> <p>Another way to achieve the purpose that we all wish to achieve, preventing large amounts of fertiliser entering our waterways, would be to link this Rule to Rule 42. If fertiliser is considered a contaminant, then the limits imposed by Rule 42 would help achieve the outcome that is being sought in a practical manner.</p>

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

<p>The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):</p>	<p>My submission on this provision is: →</p>	<p><input type="checkbox"/> I support the provision  <input checked="" type="checkbox"/> I oppose the provision  <input type="checkbox"/> I wish to have the specific provision amended</p>
<p>Rule 94- Cultivation or tilling of land- permitted activity (p 151)</p>	<p>Reasons for my submission: →</p>	<p>This rule notes that tilling and cultivation cannot be within 5m of a surface water body. In this plan, as with the previous draft, this definition of surface water body includes farm drains.</p> <p>We have raised concerns about this rule before and appreciate the Council's concern that silt does not enter the waterways. As we have noted, farmers and rural land owners are equally concerned. Silt lost in flood events represents a loss of fertiliser, seed as well as work hours. It is a situation that we all wish to avoid.</p>
	<p>I seek the following decision from WRC (give precise details): →</p>	<p>In our previous submission, we suggested that in terms of the rules for cultivation, tilling, as well as break feeding (Rule 95- break feeding- permitted activity) "drains" that are man made are excluded from the definition of a surface water body.</p> <p>We still consider this would be the most effective method and would be consistent with the RMA which does not include "drains", for example, in the definition of "river".</p> <p>We consider that rather than focus on a limit between the edge of cultivation and a drain, it would be more beneficial to instead encourage best practice methods. Providing guidelines to farmers and rural land owners would, we consider, be more effective in preventing "sediment laden surface water resulting from cultivation flowing into a surface water body". We propose that best practice methods should be encouraged, such as the installation of silt traps in drains, rather than imposing an artificial limit.</p> <p>Another way this could be addressed would be by including the following:  (g) all reasonable steps shall be taken to minimise the generation and release of sediment and the discharge of any sediment.</p> <p>We also suggest that a distinction be made between horticulturalists, who may till the soil more frequently, and farmers.</p> <p>We note that drains are not fast flowing normally.</p> <p>We also note that the same clause appears in Rule 95- break feeding-</p>

		permitted activity and that a similar approach of encouraging best practice should be adopted.
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The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  Rule 119- Clearing flood debris and beach contouring- permitted activity (p 170)	My submission on this provision is: →	<input type="checkbox"/> I <b>support</b> the provision <input type="checkbox"/> I <b>oppose</b> the provision <input checked="" type="checkbox"/> I <b>wish to have the specific provision amended</b>
	Reasons for my submission: →	Clause (g) provides that beach contouring shall not extend to a depth greater than 1 m.
	I seek the following decision from WRC (give precise details): →	We suggest that this be reworded "to a depth no greater than it was prior to the flood event" to allow for situations when the build-up of debris as result of a flood event is greater than metre. While this may not be the usual build up, the Wainuiomata River valley system does occasionally result in more significant events.

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

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  Rule 121- maintenance of drains- permitted activity (p 172)	My submission on this provision is: →	<input type="checkbox"/> I <b>support</b> the provision <input checked="" type="checkbox"/> I <b>oppose</b> the provision <input type="checkbox"/> I <b>wish to have the specific provision amended</b>
	Reasons for my submission: →	We have questioned the practicality of this rule previously as we believe that to be able to clear either only one side of a drain or the middle channel is not practical, particularly when machinery is hired.
	I seek the following decision from WRC (give precise details): →	<p>We would like to discuss with you the proposition that instead of stipulating how the farmer must clear his man made drains, the rule should state that when it is the landowner's responsibility, whether maintaining or clearing a drain, that the land owner must ensure that any outflow into a category 2 waterways meet Greater Wellington's measures that are used as provided for in other rules and in the general conditions:</p> <p>that it does not cause a conspicuous change in colour or visual clarity of water discharged from a drain</p> <p>This change would enable the result to be measured in the same way that other rules are measured and provide a constant method for rural property owners to monitor how their actions are affecting the waterways.</p>

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

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):  Stock access to waterways	My submission on this provision is: →	<input checked="" type="checkbox"/> I <b>support</b> the provision <input type="checkbox"/> I <b>oppose</b> the provision <input type="checkbox"/> I <b>wish to have the specific provision amended</b>
	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	WSe would like to thank the Council and officers for the way in which they took pains to understand the issues from our community's point of view and who came up with a solution that we can all work with.

