

Proposed Natural Resources Plan:

Submitter:

Warren Bryant

Submitter Number:

S151

#1530926

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Wellington Regional Council
27 OCT 2015

SUBMISSION on the proposed Natural Resources Plan for the Wellington Region

To: regionalplan@gw.govt.nz OR Freepost 3156, GWRC, PO Box 11646, Wellington 6142

Name	Nathan Bryant
Farm Name	Huiu Farm
Physical Address	739 Oharia Valley Rd OHARIA Wellington
Phone Number	4993313
Email Address	huiufarm@gmail.com

Communication from GWRC: I prefer email OR hardmail choose one

Trade competition: I could not gain an advantage in trade competition through the submission

Hearing: I wish to be heard and would consider jointly appearing with other submitters

Support: support Wairarapa Federated Farmers submission ✓

INTRODUCTION – Key Points about farm/business

Farm Type	e.g. Sheep, Beef, Arable, Dairy, agricultural business
Farm size (area)	hectares 840
Main Waterways	
GW Soil plan or Farm Plan	Yes <u>No</u>
Environmental investments	A 10Ha area fenced off 2012 for native regeneration & have planted 1000 plus native plants (local Wairarapa)
QE2 or Retirement Blocks	No
General Comments	e.g. if you like the partnership approach with council staff on the ground, say so

→ All plants have been sourced from Forest & Bird Wairarapa branch (Being plants locally sourced).

STOCK EXCLUSION

Specific Provisions that my submission relates to are:

Definition of Category Two waterbodies, including water races and drains > 1 metre

Schedule I and Map 22: important trout spawning habitat

Rule 97: access to the beds of surface waterbodies by livestock

- Stock exclusion from Category One waterbodies by July 2018
- Stock exclusion from Category Two waterbodies by July 2022
- Stock access to Category Three waterbodies – permitted subject to conditions, e.g. crossings

My submission is: ~~support~~/oppose

I seek the following changes:

Extend the timeframes, e.g. Category One by 2020, Category Two by 2025

Exclude sheep from Category One

Exclude water races and drains from Category Two

Delete requirement for dairy cow exclusion from hill country rivers > 1 metre

Specify that stock exclusion from spawning sites – inanga or trout – is during the spawning season.

Specify criteria for “important” trout spawning rivers; delete those that don’t meet the criteria

Amend the definitions of stock crossing to match hill country practicalities and effects

Allow for stock drinking points

Ensure that alternative stock water supplies are available and rules don’t apply until they are.

Stock Exclusion Comments and Reasons

*Specific to your farm, e.g. discussion on costs, practicalities, stock water; attach/include photos
For Category One sites, would it be reasonable to exclude sheep where there is agreement between
landowner, council and iwi as part of Council funded management plan?*

WETLANDS

Specific Provisions that my submission relates to are:

Interpretation: definition of natural wetland and significant natural wetlands

Schedule F3: significant wetlands

Rule 105: Planting in wetlands - approved native plants only

Rule 106: Restoration of natural or significant wetlands – controlled if Wetland Management Plan

Rule 107: Activities in natural or significant wetlands – discretionary

Rule 108: Activities in wetlands - non-complying, including diversion of water into a natural wetland

My submission is: ~~support~~/oppose

I seek the following changes:

Natural wetlands: Natural wetlands: amend to exclude intermittent and ephemeral water bodies, and clarify these do not include hill country seeps or paddocks subject to regular ponding, dominated by cultivated pasture, whether or not associated with sedge, raupo or rush species.

Significant wetlands: re-prioritise to focus efforts on the highest value sites; change minimum size from 0.1ha to 1.0ha

Rule 104: allow use of machines rather than just hand held

Rule 105: allow for planting introduced species for bees or ducks

Rule 106, 107: amend to provide for restoration or enhancement of wetlands to be a permitted activity, with plans prepared as a non-regulatory partnership.

Rule 108: Allow diversion of water as part of a restoration plan

Wetlands Comments and Reasons

*e.g. If you have been advised of a significant wetland on your farm – and you question it – state the name of the wetland and your reasoning (size, condition, man-made, etc)
Mention if you have an interest in constructing or extending wetlands.*

FARM EFFLUENT

Specific Provisions that my submission relates to are:

Rule 83: Discharge of collected animal effluent to land – controlled

Rule 93: effluent to land in supply protection area – discretionary

Map 27: groundwater community drinking water supply protection areas

My submission is: ~~support~~/oppose

I seek the following changes:

Undertake more rigorous regional cost-benefit analysis of pond storage and sealing requirements prior to the hearing to support proper consideration by the Hearing Commissioners.

Provide reasonable timeframes and a stepped approach for the installation of storage (e.g. 3-5 years)

Clarify the definition of ponding; and exclude extreme weather events, breakdowns occurring out of manager’s control, be consistent with urban conditions.

In groundwater protection areas, undertake a risk analysis prior to the hearing to support appropriate conditions being established in a controlled rule, rather than discretionary.

Extend the consent timeframe to 20 years to reflect the investment made

Effluent Comment and Reasons

*e.g. are they over-estimating the risks and under-estimating the costs?
If you already have ponds, is it reasonable to up the ante on storage and sealing?*

SILAGE

Specific Provisions that my submission relates to are:

Definition: a fermented high moisture stored fodder

Rule R90: manufacture and storage of silage and compost, including

- Condition a) the manufacture and storage area shall not be located within 20m of a surface water body (stream, drain, water race and intermittently flowing streams)
- Condition d) the walls and floor of a silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water

My submission is: support/oppose

I seek the following changes:

Delete the requirement for impermeable lining; retain the condition that there be no discharge to water

Delete the requirement for location not allowed within 20m of a surface water body (not needed due to no discharge condition above)

Change the definition to specify this does not include baleage

Silage Comments and Reasons

*e.g. low risk from wilted silage; costs for impermeable lining – estimate the costs if you can
Cost Benefit analysis has not included any clear evidence of the benefits outweighing the costs.
Difficulty in dealing with surplus years – filled up the main stack but still have extra. This rule will make us turn to baleage that is twice as expensive and has the plastic disposal issues.*

CULTIVATION & BREAKFEEDING

Specific Provisions that my submission relates to are:

Rule 94: Cultivation & Rule 95: Break feeding

- Cultivation/ break feeding shall not occur within 5m of a surface waterbody, including open drains and water races

My submission is: ~~support~~/oppose

I seek the following changes:

Delete the conditions requiring 5m setbacks

Cultivation/Breakfeeding Comments and Reasons

e.g. costs, practicalities, timing, lay of the land

Add a statement in about what you normally do when cultivating or breakfeeding

DRAIN CLEANING

Specific Provisions that my submission relates to are:

Definition of highly modified watercourse:

- Modified and channeled to the extent it has the characteristics of a drain, including that: the channel is a single flow, straight, no curves, mechanically formed with straight or steep banks, maintained to keep the watertable at least 0.3m below the pasture root zone, and it exhibits these characteristics for the entire length of the property

Rule 121: Maintenance of drains and highly modified streams; *and*

Rule 122: Removing vegetation from the bed of any river; *same conditions for both*

- any fish shall be returned no later than one hour
- only one side shall be cleared at any one time, and the other side three months later; or, only the middle shall be cleared, leaving no less than 0.3m each side
 - for drains and highly modified streams, this condition applies from July 2017

Method M14: Maintenance of drains

- GWRC will develop an education programme in collaboration with industry and other stakeholders to support implementation of Rule 121

My submission is: ~~support~~/oppose

I seek the following changes:

Change the definition of highly modified stream to include all streams that have been modified by human activity – straightening, deepening, channeling.

Provide high resolution maps in the plan, clearly showing drains and highly modified streams that are covered by Rule 121. This is required before the hearing to see the scale of the issue.

Provide direction to landowners about the type of waterways on their land.

Fast-forward Method 14 to develop agreed good practice for drain cleaning to inform the Hearing Commissioners consideration of the proposed rules.

Extend the timeframe for the implementation of the new conditions from 2017 to 2020

Drain Cleaning Comments and Reasons

e.g. costs, practicalities, historical modification not recognized

EARTHWORKS

Specific Provisions that my submission relates to are:

Definition of earthworks

Rule R99: earthworks of a contiguous area up to 3000m² per property per 12 months – permitted

Rule 101: earthworks that doesn't meet permitted conditions - discretionary

My submission is: support/oppose

I seek the following changes:

Amend the definition and Rule 99 to allow construction of farm tracks as a permitted activity, as well as maintenance.

Change Rule 101 to controlled or restricted discretionary with clear conditions

Earthworks comments and reasons

e.g. operational and farm safety aspects

Note the word "contiguous" is important in thinking about impact

VEGETATION CLEARANCE on Erosion-Prone Land

Specific Provisions that my submission relates to are:

Definition of erosion-prone: slope >20 degrees

Definition of vegetation clearance: clearance of woody vegetation (exotic or native) by mechanical or chemical means including felling, spraying by hand or aerial means, hand clearance and burning

Rule R100: vegetation clearance on erosion-prone land

- contiguous area up to 2ha per property per 12 months– permitted

Rule 101: vegetation clearance that doesn't meet permitted conditions - discretionary

My submission is: support/oppose

I seek the following changes:

Change definition of erosion prone to increase the slope, and exclude stable substrate, e.g. greywacke

Change definition of vegetation clearance to exclude hand clearance, hand or aerial spraying and roller crushing

Change Rule 101 to controlled or restricted discretionary with clear conditions

Vegetation Clearance comments and reasons

e.g. confusion with different slope triggers.

Add a statement in about what you normally do, e.g. leave an area unsprayed

Note the word "contiguous" is important in thinking about impact

CULVERTS & BRIDGES

Specific Provisions that my submission relates to are:

Rule R114: weirs, fords, small bridges – permitted if

- not >20m² in size / footprint
- catchment not >50ha west of the Ruamahanga, 200ha east of the Ruamahanga

Rule R115: culverts – permitted if

- not >20m length and not >0.3m-1.2m diameter

Rule 125: small river crossings, dams, structures in a mana whenua site – restricted discretionary

My submission is: ~~support~~/oppose

I seek the following changes:

Rule R114: Change the 50ha catchment restriction to 200ha (or clarify rationale for the difference)

- Increase the size for fords and bridges (20m² too small)

Rule R115: delete the condition restricting culvert diameter; retain condition that the culvert be constructed to allow for 20 year flood event.

- Provide advice to landowner of appropriate culvert sizes to achieve the above condition

Mana whenua sites: undertake proper assessment of restrictions proposed for mana whenua sites within the plan itself – not leaving this to a consent process at landowner cost

Culverts/Bridges comments and reasons

e.g. fords/crossings good alternative method to constructing structures especially where use is infrequent or risks of structure outweigh the impact of a ford.

OFFAL PITS, FARM REFUSE DUMPS

Specific Provisions that my submission relates to are:

Rule 89: Farm Refuse Dumps – 15 conditions

Rule 91: Offal Pit – 9 conditions

My submission is: ~~support~~/oppose

I seek the following changes:

Rule 89: Farm Refuse Dumps

- increase size from 50m³ to 100m³
- heavily prune the fourteen other conditions to focus on clear effects

Rule 91: Offal Pits

- retain condition a) re only containing dead matter from the property; and condition h) odour is not offensive beyond the boundary
- heavily prune the other seven conditions to focus on effects

Offal Pits/Refuse Dumps Comments and Reasons

e.g. these are an existing activity on farms and do not cause adverse effects so do not need multiple conditions.

AGRI-CHEMICALS

Specific Provisions that my submission relates to are:

Rule 36: Agrichemicals – permitted activity conditions relating to aerial and vehicle based spraying

- (e) no discharge within a community drinking water supply protection area
- (g) spray plan must be prepared once pa
 - identify sensitive areas (dwelling house, schools, amenity areas, non-target crops sensitive to agchem, organically certified properties, surface water bodies including natural wetlands and associated riparian vegetation, and significant and outstanding water bodies)
 - notify neighbours the spray plan is available on request
 - get written agreement from adjoining neighbours that notification is not required
 - supply a copy of the spray plan at least 24 hours prior to application, to the owner/occupier of sensitive areas or likely to be directly affected, or requests a copy

My submission is: support/oppose

I seek the following changes:

Change condition g) to more reasonably reflect practicalities and risks

In water supply protection areas, undertake a risk analysis prior to the hearing to support appropriate conditions being established in a controlled rule, rather than discretionary.

Agri-chemicals Comments and Reasons

e.g. provides a level of protection that is not associated with the risk, demands undue notification requirements when neighbours might not be affected

FERTILISER

Specific Provisions that my submission relates to are:

Rule 82: Application of fertilizer – permitted activity, provided

Condition a) not into or onto a surface water body or beyond the boundary, including as a result of wind drift

My submission is: ~~support~~/oppose

I seek the following changes:

Amend condition a) to reflect the practicalities of aerial fertiliser application

Fertiliser Application Comments and Reasons

e.g. It is impossible to miss all intermittent surface waterbodies when using a plane or helicopter. Technology is being developed to allow this but it is not commercially available. Condition a) will cause a health and safety risk to the operation of aerial fertilizer application.

STORM WATER

Specific Provisions that my submission relates to are:

Rule R48: storm water from individual property permitted, except

- the discharge is not into an outstanding waterbody (e.g. Lake Wairarapa)
- concentration of total suspended solids does not exceed specified concentrations
 - 50g - 100g/m³ or 20-33% change depending on “significance” of site

My submission is: ~~support~~/oppose

I seek the following changes:

Rule R48: delete condition (a): no discharge into outstanding waterbodies

Delete condition (e) specifying suspended solid concentrations, retain condition (g) requiring no conspicuous films, scum, floatables etc

Stormwater comments and reasons

e.g. impracticality, costs, low risk. Would it require a consultants report to get consent?

Any other areas of concern – just copy format above