

Proposed Natural Resources Plan:

Submitter:

Simon Stannard

Submitter Number:

S115

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

Or email: regionalplan@gw.govt.nz

Your details

Full name: Simon Stannard

Organisation name: _____
 (If applicable)

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Waikanae 5391 _____

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Contact person: _____

Address and telephone no (if different from above): _____

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: simon@stannard.com

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): Rule R36: Agrichemicals – permitted activity	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: →	This creates onerous or expensive weed control for small block holders by restricting control of problematic weeds in rural areas to knapsack only (would not be able to use small lance based spray unit on ATV) application (non commercial) without onerous GROWSAFE® time/cost compliance requirements resulting in ineffective weed control unless farm operation substantial. Potential knock-on effect with respect to cost and productivity drop to neighbouring properties resulting in proliferation of the Californian Thistle problem. There are already adequate nation wide restrictions on supply of certain agrichemicals.

		For example this would amplify issues on properties bordering for example KCDC control responsibilities (Blackberry) on corner of Greenhill Road and SH1 Rail Reserves along SH1(Gorse).
	I seek the following decision from WRC (give precise details): →	Remove (h) for ground-based applications where the applicator is not a commercial applicator ... or ammend to exempt Grosafe requirement for less than for single application of less than 1,001lt of (mixed/diluted) agrichemical.

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 R40: Discharge of other fumigants – controlled activity	My submission on this provision is: →	<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
	Reasons for my submission: →	When using fumigants that have a manual activation (eg addition of water) there will always be some (even small) discharge into the air. The use of the common rabbit fumigant (phosphine) would become a controlled activity resulting in a significant reduction in use and resulting explosion of rabbit (pest) population.
	I seek the following decision from WRC (give precise details): →	Remove the rule or modify it to be controlled activity only when used to fumigate areas are greater than 17m3 per application.

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 R136: Take and use of water – permitted activity	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: →	Under the current rules (20m3/day) a small rural block owner (majority are < 20ha) could effectively irrigate a few ha during the night with a small bore and a 6 pod irrigation system in addition to supply of water for stock, household use, and garden watering. (The high cost of power for pumping already balances out the risk of waste.) This reduction represents more than halving the daily take for small blocks and doesn't support with intent of RMA regarding existing users unfairly burdens smal rural holdings who have no water supply choices. Note: KCDC are on record as not intending to share their groundwater take with impacted rural users during hearings regarding their own application for borefields in support of river recharge.
	I seek the following decision from WRC (give precise details): →	Modify to read: (a) the total take, excluding water for household and garden use, per property shall not exceed the following rate and volumes, and Remove the table restricting use by property size and substitute Volume per day 20m3 & 2.5l/s except for firefighting.

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 R141: Take and use of water – controlled activity	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: →	As written this rule introduces the requirement for Resource Consent to use any bore, even one using less than 20m3 a day. This is an unfair burden on rural block holders without council water reticulation.
	I seek the following decision from WRC (give precise details): →	Modify to read in conjunction with my modification of Rule 136. The take and use of water from a surface water body or groundwater is a controlled activity, unless the following conditions are met: (a) the take and use was in existence on a property at the date of public notification of the Proposed Natural Resources Plan (31.07.2015), or (b) the total take and use per property, complies with Rule R136 and [leave the remaining clauses]

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: 25/10/2015

[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:

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	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	

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	Reasons for my submission: →	
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	Reasons for my submission: →	
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	Reasons for my submission: →	
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