

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



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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

Terry Parminter

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

KapAg Ltd

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

PO Box 354
Paraparaumu, 5352

PHONE

021 902656

FAX

EMAIL

terry.parminter@kapag.nz

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.

The provisions in the PNRP affect the business of my company's clients

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:

Date:

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 Name of person/ group making original submission and postal address.	Original submission number The original submission number can be found on the submitter address list.	Position Whether you support or oppose the submission.	Part(s) of the submission you support or oppose Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions.	Reasons Why you support or oppose each submission point.	Relief sought 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...
Beef & Lamb NZ	S311	Generally support	S311/2.5	I support the need for a regional framework that guides Whaitua decision making. This need particularly applies to the initial allocation of nutrient loads. There needs to be consistency in allocation across the whole region to ensure that the intent of the regional plan to for water quality across the whole region to be maintained or improved can be realised.	It is unclear from the submission how these principles would be introduced into the plan. Perhaps in the Whaitua chapters or in the Other Methods section?
			S311/2.9	I suggest an allocation system that starts with “grandfathering” existing nutrient losses and moves over 20-30 years towards a system where these are averaged over soil types depending upon known risk factors.	

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

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Federated Farmers of New Zealand	S352	Support with further amendments	Amend submission on M1	On page 9 of their submission Federated Farmers make the point that WRC has not made a commitment to work with industry groups to develop and resource “jointly owned” strategies that can be effective at encouraging voluntary behaviour change without the costs (regional and personal) of developing and enforcing rules. I agree because this point was made a number of times through the process of public and stakeholder process and because a strategically designed behaviour change process can be more effective than rules. Reference: http://www.regional.org.au/au/ap/en/2006/refereed/3/2863_parmint_ertg.htm	“Wellington Regional Council will <u>work with industry groups and other agencies to develop, implement and monitor, practice-change strategies a work programme to that support ... including but not limited to the production of: ...”</u>
		Support	Critical Recommendations on pages 3&4 of the submission	The current section 32 reports make it difficult to assess the cumulative impact of the PNRP on primary production. They	A section32 report for Primary Production should be prepared prior to the hearing and made available to all submitters.

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				contain gaps, the benefit-cost analyses are incomplete, and there are some errors.	
		Support	New Policy – Land and Water Management Framework	Support this policy as a mechanism for encouraging GWRC to work with TAs and industry groups in the development of strategies for voluntary adoption of practice changes.	
		Support with further amendments	Amendments to Rule 83	<p>Both GWRC and Federated Farmers appear to support the move towards deferred irrigation of effluent to land and the required investment in effluent storage.</p> <p>I support the proposal by Federated Farmers for separate rules for existing farmers and new farmers.</p> <p>I agree with Federated Farmers that there should be no control over the specific herd size for properties as that has no obvious relationship to the risks of effluent contamination. The relationship between herd size and effluent load is adequately addressed in determining pond size and effluent distribution.</p> <p>I support GWRC requiring controlled consents by all farmers applying effluent to land so that they can monitor progress.</p>	<p>(1) Existing dairy farmers. I agree with Federated Farmers that the capital expenditure will generally be over \$100,000 per farm. Therefore I would encourage GWRC to work with the industry in the establishment of a deferred-interest loan for farmers that can be paid back in years when the dairy payout is over \$6/kgMS. Existing farmers should be required to apply for a controlled consent when their existing consent runs out – if that is greater than 12.5 years from when the plan becomes operative or on resale of their farm, whichever comes sooner.</p> <p>(2) New dairy farmers. These should have effluent management systems designed for deferred irrigation. There are too many consent conditions for practical use. Limit these to:</p> <ul style="list-style-type: none"> • Effluent storage volume and construction determined with Effluent Storage Calculator. • Effluent application rates. • Nutrient loading rates per hectare per year. • Contingency plans for prolonged wet weather, mechanical failure

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
					and other breakdowns. <ul style="list-style-type: none"> • Odour mitigation methods.

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