

Proposed Natural Resources Plan:

Submitter:

Java Trust Limited

Submitter Number:

S120

SUBMISSION # 13
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

Java Trust Limited
575 Waihakeke Road
Carterton RD2, 5792
(06) 370-3227
jdlynchnz@gmail.com

Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. Rule 105 planting and pest control in wetlands.

The reasons for this submission include;

1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. Java agrees with the intent of the rule but the rule fails to recognise that the dwelling and associated garden on Java's property may be controlled inadvertently by the rule. For example, the lawn goes to the edge of the oxbow and it is mown by a ride-on mower. There are exotic plants in the garden. Native plants are used exclusively around the rest of the oxbow.
4. The removal of plants should not be restricted to removing *appropriate pest plant species*. For example, it may be appropriate to remove non-pest plant species. It is unclear what is an *appropriate pest plant*.
5. Limiting people to using *only hand-held machinery* is impractical and unreasonable. For example, willows which are a pest plant can be very large trees so large machines are required to remove them. Those caring for wetlands will not use machines which would damage the wetland. Conversely it will be damaging to the wetland if the willows are not removed.

Java seeks the following relief;

1. Delete Rule 105.
2. Amend all related provisions accordingly;
3. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;

A handwritten signature in black ink, appearing to read "Gina", is written over a horizontal line. The signature is stylized and cursive.

SUBMISSION # 10
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

Java Trust Limited
575 Waihakeke Road
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(06) 370-3227
jdlynchnzi@gmail.com

Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. 4.6.2, on page 60, Policy 40; Ecosystems and habitats with significant indigenous biodiversity value.
2. 4.6.2, on page 60 Policy 41; Managing adverse effects on ecosystems and habitats with significant indigenous biodiversity value.
3. Schedule F3 significant wetlands; the inclusion of Taumata Oxbow.

The reasons for this submission include;

1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. Java's goal is to restore and maintain the part of the Taumata Oxbow on its property.
4. Java and its agents have invested substantial time and resources to achieve this goal but more needs to be done.
5. The Taumata Oxbow is not "natural" given that large areas have been excavated.
6. The Taumata Oxbow is situated in a highly modified area surrounded by farms and the climate has been modified by global warming which is a significant threat to wetlands, especially oxbows.
7. The Taumata Oxbow is flooded by silt-laden water from the Ruamahanga and Waiohine Rivers which results in sedimentation. The PNRP as notified requires protection of the

sedimentation which is itself an adverse effect of flooding caused in part by modification of the environment up-river.

8. The Taumata Oxbow has been and still is to a material degree infested with exotic willows. Evapo-transpiration depletes the water in the oxbow. The willow weedmat clogs up the wetland. The willows need to be removed. The PNRP as notified requires protection of the exotic willows which have serious adverse effects on wetlands.
9. The Taumata Oxbow is not pristine. To maintain its values it requires clearing of willows to allow natives to be planted, removal of sedimentation and maintenance all of which will result in adverse environmental effects to some degree and for a time.
10. The restrictive provisions in the PNRP will have unintended adverse environmental effects on the oxbow and other wetlands.
11. Taumata Oxbow should be removed from Schedule F3 because it is not natural and to allow it to be properly maintained.
12. The PNRP fails to duly recognise that the owners of wetlands are committed to maintaining and enhancing them for future generations. The PNRP is based on the opposite premise and places obstacles in the way of those committed to wetlands and it discourages people from looking after them.

Java seeks the following relief;

1. Delete P40 and P41.
2. Delete Taumata Oxbow from Schedule F3.
3. Amend all related provisions accordingly.
4. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;

A handwritten signature in black ink, appearing to be 'Gunter', written over a rectangular box that serves as a signature line.

SUBMISSION # 6
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

Java Trust Limited
575 Waihakeke Road
Carterton RD2, 5792
(06) 370-3227
jdlynchnz@gmail.com

Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. Objective 23 "Water Quality" on p39.

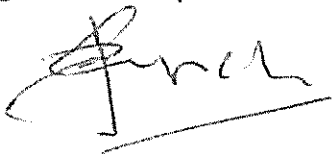
The reasons for this submission include;

1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. NPSFM requires "overall" maintenance and improvement of water quality.
4. It is appropriate to include the word "overall" in O23.

Java seeks the following relief;

1. Amend O23 so the overall quality of water is maintained and improved.
2. Amend all related provisions accordingly;
3. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;



SUBMISSION # 2
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

Java Trust Limited
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Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. 2.2 on p18 "Artificial farm drainage canal";
2. 2.2 on p22 "Drain";
3. Rule 121 Maintenance of Drains;
4. All provisions relating to Artificial farm drainage canals and drains.

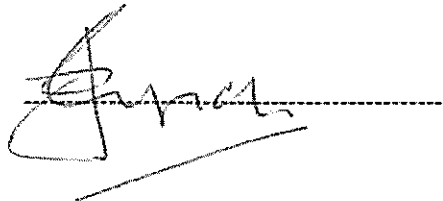
The reasons for this submission include;

1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. The provisions relating to artificial farm drainage canals and drains are too complex and confusing;
4. Drains and canals have to be cleaned and cleared to operate properly, including by removing vegetation and sediment which builds up;
5. The requirement to use a weed bucket when a drain is dry is unjustifiable, inefficient and unreasonable;
6. The requirement to clear only part of a drain at a time after 31 July 2017 is impractical, inefficient, unjustifiable and unreasonable.

Java seeks the following relief;

1. Amend the PNRP so cleaning and clearing of artificial farm drainage canals and drains is a permitted activity without restrictions at all times;
2. Amend all related provisions accordingly;
3. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;



SUBMISSION # 14
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

Java Trust Limited
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Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. Rule 108 Non-complying activities in wetlands including;
 - a. *(a)....damming or diverting water into, within, or from the natural wetland;*
 - b. *(b) Land disturbance including excavation and deposition;*
2. The failure to adequately provide for existing pipes, diversions of water, drains, artificial farm canals and similar works as permitted activities.

The reasons for this submission include;

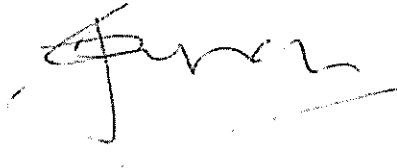
1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. There are existing pipes/channels/canals connecting the Taumata Oxbow and the Ruamahanga. Ruamahanga floodwater enters the oxbow via the pipes, canals and channels. This is beneficial for the oxbow.
4. There is an existing small weir to try to maintain the water level in the oxbow and this is beneficial for the oxbow.
5. Until recently Waiohine floodwater has often flowed into the Taumata Oxbow but GWRC's decision not to maintain a stopbank means this no longer occurs and the loss of this water is detrimental to the oxbow. Diversion of water from the Waiohine into the Taumata Oxbow would benefit the oxbow and it is a project under consideration.
6. Land disturbance can be required to carry out works beneficial to the wetland and planting.

7. The non-complying status is a one size fits all approach which will not provide duly for existing and future works and activities.

Java seeks the following relief;

1. Delete Rule 108.
2. Include a rule providing that all existing pipes, channels, canals and weirs within and outside wetlands are permitted and not subject to conditions.
3. Amend all related provisions accordingly;
4. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;

A handwritten signature in black ink, appearing to be 'J. M. ...', written over a horizontal line.

SUBMISSION # 9
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

Java Trust Limited
575 Waihakeke Road
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(06) 370-3227
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Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. Policy 8 on p51 Beneficial activities; *(h) maintenance and use of existing structures in the coastal marine area and natural wetlands and the beds of rivers and lakes.*

The reasons for this submission include;


1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. Policy 8(h) is helpful but it is limited to structures which is too restricted.
4. Policy 8(h) should also recognise and provide for all existing activities, pipes, drains, artificial farm canals, weirs, fences, other works and gardens.
5. Java's property has pipes, canals and drains which are essential for maintaining the property, including the wetland.
6. The dwelling on Java's property is part of the original farm and probably first erected well over 100 years ago. The associated garden and lawn may be in the identified wetland area.

Java seeks the following relief;

1. Amend Policy 8(h) so it is not limited to structures but applies to all existing pipes, artificial farm canals, drains, weirs, fences, gardens and other works.
2. Provide for all such activities as permitted activities not subject to conditions.
3. Amend all related provisions accordingly;

4. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;

A handwritten signature in black ink, appearing to read "Gina", is written over a horizontal line. The signature is stylized and cursive.

SUBMISSION # 5
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

Java Trust Limited
575 Waihakeke Road
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(06) 370-3227
jdlynchnz@gmail.com

Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. 2.2 on p26 "Natural lake";
2. 2.2 on p27 "Natural wetland";

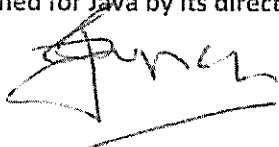
The reasons for this submission include;

1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. "Natural lake" as defined may be part of a wetland;
4. "Natural wetland" may include a lake;
5. A water body should be in only one of those definitions and not both which would be confusing;
6. The Taumata Oxbow should be identified as a wetland only.

Java seeks the following relief;

1. Amend the definition of "Natural lake" so it excludes water bodies which are part of wetlands;
2. Amend the definition of "Natural wetland" so it excludes lakes;
3. Amend all related provisions accordingly;
4. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;



SUBMISSION # 1
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN.

Java Trust Limited
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Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. 2.1.6 (p16) Maps (Chapt 13) for indicative purposes only.
2. Map of Taumata Oxbow.
3. Schedule F3 Taumata Oxbow's references.

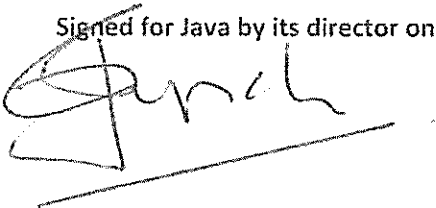
The reasons for this submission include;

1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow listed in Schedule F3 which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to and maybe partly within the scheduled Taumata Oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too rigid and unrealistic.
3. The Taumata Oxbow is not sufficiently clearly identified in a way which is readily accessible.
4. The area identified as the Taumata Oxbow exceeds the area of the oxbow and includes areas used for other purposes.

Java seeks the following relief;

1. Identify the Taumata Oxbow on a printed map;
2. Amend the area identified as the Taumata Oxbow by excluding areas used for the dwelling, its garden and for farming.
3. Amend all related provisions accordingly;
4. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015



SUBMISSION # 12
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

Java Trust Limited
575 Waihakeke Road
Carterton RD2, 5792
(06) 370-3227
jdlnchnz@gmail.com

Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. Rule 94 5m set-back for cultivation and no sediment-laden surface water resulting from cultivation to enter a surface water body.

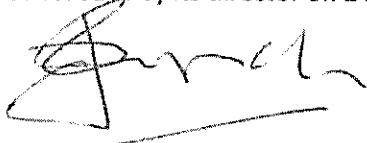
The reasons for this submission include;

1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. The 5m set-back is excessive, especially on Java's property which has long water frontages.
4. It is impracticable and unreasonable to expect people to ensure that sediment-laden water does not enter a surface water body. For example, Java grows maize which is in the ground for about 6 months and during that time some sediment-laden water might enter surface water if there is very heavy rain.

Java seeks the following relief;

1. Delete Rule 94.
2. Amend all related provisions accordingly;
3. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;



SUBMISSION #11
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

Java Trust Limited
575 Waihakeke Road
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(06) 370-3227
jdtynchnz@email.com

Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. 4.8.8, Policy P95; Discharges to land on p39.

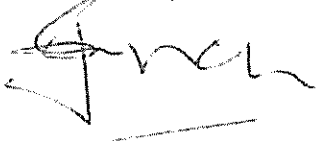
The reasons for this submission include;

1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. Discharges to land need to be controlled, but parts of P95 are impractical, including;
 - a. *(c) not exceeding the natural capacity of the soil to treat, use or remove the contaminant;*
 - b. *(d) not exceeding the available capacity of the soil to absorb and infiltrate the discharge;*
 - c. *(f) not resulting in a discharge which enters water.*
4. In an ideal world all fertiliser applied to land would be used by plants but such precision is not possible. Conditions vary; e.g. if it rains after applying fertiliser then it is likely some will be washed away.

Java seeks the following relief;

1. Delete P95(c), (d) and (f).
2. Amend all related provisions accordingly;
3. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;



SUBMISSION # 7
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

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Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. Objective 24 "Water Quality" on p39.

The reasons for this submission include;

1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. "Contact recreation" sets a standard which is inappropriately high.
4. The requirement for natural wetlands and other water bodies to be suitable for Maori customary use is inappropriate and unjustifiable when there is no such use of a particular water body such as the Taumata Oxbow.
5. Omission of the word "overall" in the NPSFM is inappropriate and unreasonable.

Java seeks the following relief;

1. Delete O24.
2. Amend all related provisions accordingly;
3. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;



SUBMISSION # 8
BY JAVA TRUST LIMITED
ON GWRC'S
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Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. 3.10, Objective 44 on page 46 Land Use; *The adverse effects on soil and water from land use activities are minimised.*
2. 4.1, Policy P4 Minimising adverse effects.
3. 4.8.2 on page 68, Discharges to water, Policy P67; Minimising effects of discharges.

The reasons for this submission include;

1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. O44 that effects are minimised is extreme, unreasonable and unjustifiable.
4. P4 provides that *minimisation means reducing adverse effects of the activity to the smallest amount practicable and shall include....* and those provisions are extreme, unreasonable and unjustifiable.
5. P67 provides for control of discharges to water and while Java supports controls to have good water quality, the requirement to *minimise* will have serious unintended consequences.

Java seeks the following relief;

1. Delete O4, P4 and P67.
2. Amend all related provisions accordingly.

3. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;

A handwritten signature in black ink, appearing to be "F. J. ...", written over a horizontal line.

SUBMISSION # 4
BY JAVA TRUST LIMITED
ON GWRC'S
PROPOSED NATURAL RESOURCES PLAN

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Java Trust Limited ("Java") wishes to be heard in support of its submission.
Java's address for service is P O Box 134, Greytown 5742.

This submission is in relation to the following provision in the PNRP and all related provisions;

1. 2.2 on p23 "Farm refuse dump";
2. 5.3.8 on p146 Farm refuse dumps a permitted activity subject to conditions;

The reasons for this submission include;

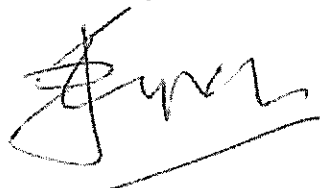
1. Java's property at 575 Waihakeke Road includes;
 - a. Part of the Taumata Oxbow which Java is actively maintaining and restoring;
 - b. A dwelling and its garden immediately adjacent to the oxbow;
 - c. Farmland used for cropping and grazing;
 - d. Long river/stream frontages;
 - e. Open and piped drains.
2. The provisions relating to this submission are;
 - a. Inconsistent with the purpose of sustainable management of natural and physical resources;
 - b. Contrary to good resource management theory and practice;
 - c. Fail to appropriately provide for wetlands, a dwelling and farming to co-exist on the same property;
 - d. Too complex, rigid and unrealistic.
3. Farm refuse dumps are an essential part of operating a farm in a reasonable manner;
4. Farms and farmhouses generate waste which it is appropriate to dump and burn, including wood from tree maintenance, animal carcasses and household waste;
5. All of Java's property is prone to flooding but waste still needs to be put somewhere and burnt;
6. 50m limit from a water body is excessive;
7. The provisions fail to recognise the practicalities of farming and are excessive.

Java seeks the following relief;

1. Amend the PNRP so farm refuse dumps are a permitted activity without restrictions or conditions;
2. Amend all related provisions accordingly;

3. All incidental and consequential amendments.

Signed for Java by its director on 24 September 2015;

A handwritten signature in black ink, appearing to be 'J. M. L.', written over a horizontal line.