Proposed Natural Resources Plan:

Submitter:

Hamish Trolove

Submitter Number:

S31

Submission on the Proposed Natural Resources Plan for the Wellington Region

INSTRUCTIONS FOR USING THE SUBMISSIONS SPREADSHEET:

INSTRUCTIONS

Send to: regionalplan@gw.govt.nz

Your details:

Full name: Hamish Trolove
Company name:
Address1: 188 Whites Line East
Address2: Waiwhetu
Address3:
Address4:
Town Lower Hutt
Postcode: 5010
Telephone Work: 04 9381630
Telephone Home: 04 9381630
Telephone Cell:
Email address: zedd@actrix.co.nz

Trade competition

Yes I/we **could not** gain an advantage in trade competition through this 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.

Attendance and wish to be heard at hearing(s)

I/we do wish to be heard in support of my/your submission

[Note: this means that you wish to speak in support of your submission at the hearing(s).]

Yes 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 other make a similar submission, I will consider presenting a joint case with them at a hearing.

Date: 15 Sept 2015

Introduction	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
The Whaitua committees	There needs to be some mechanism to ensure good scientific information is provided to the Whaitua Committees and that it is heeded. Also there needs to be some mechanisms and controls in place to ensure the committees do not become dominated by Selfish Interests.	It is great that GW is seeking guidance from the communities on this, but I am worried about how these committees could easily be dominated by selfish interests, and demands that the science does not support.	Implementation of some sort of controls on the Waitua Committees and a Science based Veto / overview to ensure their decisions and demands are in the best interests of all stakeholders (including the environment).

Objectives	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
O7 Provision of water for livestock	This needs to be balanced against the appropriate use of the land. For instance providing sufficient water for the needs to dairy farms in dry lands that are not appropriate for dairy farming is a poor use of a limited water resource and will have detrimental effects on the soil as well as increasing the climate change effects for that land.	I am concerned about the uncontrolled growth of dairying in lands that are unsuitable for the activity. Once incumbent they will demand more water than is appropriate for the region and for the level of economic benefit they generate compared to the evironmental costs they create.	Add a comment about only being enough to provide water for appropriate stocking rates and livestock type.
O13 Protection of Renewable Energy Development	This is good to see.		
O22 Engineering Structures are a final resort	This is a wise approach. Fairly often the cheapest and most effective solutions are a change of practice and other "human solutions".	I am pleased to see a wise approach is being proposed.	Errr...Keep up this level of thinking.

Policies	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
P7 Beneficial Use	Care needs to be taken around what is truly a beneficial use – particulalry irrigation in dry lands.	Some colleagues and I did a quick study not so long ago looking at the relative benefits of various industries compared to their climate change effects and energy consumption. It was primarily focused on the Aluminium Smelter but one of the comparisons was Dairy farming and processing. This turned out to be almost as poor as the smelter for returning benefit to NZ for the environmental and energy cost of the activity. I would expect the same to apply for irrigation for dairy compared to benefit generated. The beneficial use needs to reflect what the actual benefit is taking account of all social and environmental costs.	Beneficial Use for irrigation (in particular) is properly measured against environmental costs including soil degradation, nutrtient leaching, and climate change effects due to land use change.
P12 and P24	Great. Nicely put.		
P29 Recognising Climate Change	There needs to be a link to more activities to address the root causes of Climate Change (land use change, Energy, type of agriculture) rather than just mitigating the effects.	Dairy is one of the greatest contributors to New Zealand's growth in emissions. Strong measures are required to curb this. Similalarly Transport developments also need to take into account their role in growing New Zealand's emissions of Climate Change gases.	Provide policies and activities that have much stronger control of activities that will increase emissions of Climate Change gases.
P42 Connectivity	It is great to see recognition of the need for ecological connectivity.		
P47 Appropriate Demolition (applies to Coastal Waters Policies Too)	Is there value in leaving derelict structures in place if they are providing useful protective habitats without causing any other environmental problems?	It occurs to me that dive wrecks and articifical reefs provide good habitats and so there is a potential for other similar structures in rivers, and lakes potentially providing the same sort of ecological benefit.	Recognition that some structures will be providing valuable habitat and it mauy be worth leaving them in place in special circumstances.

P54 Open Fires	I can't believe that in this day and age open fires are still allowed.	open fires are inefficient and also generate toxic compounds because of the incomplete combustion caused by quick chilling of the gases and vapours.	Ban open fires in all airsheds
P56 Outdoor burning	Agricultural burning should be managed by providing a service where the waste can be picked up and disposed of more usefully in a biogas digester, bioenergy plant, wood pellet plant, or to add organic material to a landfill for landfill gas generation.	Agricultural burning is such a waste of a good bioenergy feed stock. Surely there are better ways of dealing with it.	Think about growing services that can make use of agricultural wastes they would otherwsie be burned.
P60 Agricultural Spraying	How can good management practices be enhanced so that they are implemented more often?	I grew up in Nelson and could see the spray drift from the orchards. It is small wonder they are all contaminated sites now. There needs to be much stronger control of this activity and encouragement of point application methods.	Stronger policies that ensure the good practices are implemented correctly at all times, and that point application techniques are used as a preference.
P63 Stormwater management	What provision can be made to enhance the use of mechanisms that hold up the peak discharge of stormwater and thereby dampen the flows – esp in built up areas?	As more areas are paved or properties become dominated by roof area, so the runoff peaks become more serious with associated erosion and property damage. It would be nice to see provision in the policies for encouraging things that will provide some "hold-up" for the water, and allow it to be discharged in a more controlled and gentle fashion. This may include things like rainwater storage tanks, "bowls" in streams, and the ability fo streams to spread out and slowdown rather than being constrained between tight banks that afre designed to get the water away as fast as possible.	Provision of policies that encourage stormwater storage particularly in built up areas.
P68 Recreational craft waste water	I am surprised to see that recerational craft are allowed to "shit is the sea". Surely there are enough facilities and good technologies available now that mean wastewater can be discharged at a marina.	There are facilities available at Marinas (or at least there should be) – boatees should be using them.	Remove the dispensation for recreational craft to dump wastewater. There should be no exceptions.
P87 Vessels – waste water	See above. There should not be a minimum size.	See above	Change the policy to be ships and boats of all sizes.

P95 Discharges to land	There needs to be recognition of the effects that some discharges have on soils where they create climate changing gases.	Climate change gases can be emitted from soils when supplied with some nutrients and compounds. This needs to be recognised.	The policy needs to recognise that some discharges can cause the soil to begin emitting climate changing gases at a higher rate than they would do otherwise.
P96, P97, P98 Land use change	The policy also needs to identify and mitigate the climate changing effects of Land use change.	This particularly relates to dairy conversion which as a significant negative impact on New Zealand's climate change emissions. Any forest clearance will lead to higher emissions activities and loss of carbon sequestration ability. This needs to be recognised.	Recognise the effects of land use change and land cover changes on the region's Climate change emissions profile.
P104 Trout Habitat	Trout are an introduced species. Does anyone know what effect they have had on the natural NZ river ecosystem? Is it appropriate to protect them? Maybe this needs to be studied by eliminating them from one catchment.	It puzzles me that New Zealand is so strongly protecting trout that are an introduced species and it is unknown the role they play is damaging the indigenous ecosystem. I think it needs study. That and the effects of banning fishing of whitebait.	Investigate the actual ecological effects of trout having been introduced. Bascially get some science behind this ratehr than the opinions of anglers.
P111 Animal needs	This needs to be balanced by considering what are appropriate quantities and type sof animals to have on the land. Ie not catering for dairy in naturally dry lands.	As earlier, I am concerned about inappropriate land use and the detrimental effects that has on the environment and the economy. By providing water that supports these innapropriate activities it only reinforces the behaviour and conversions of other farms.	Adjust the policy to make reference to appropriate stocking rates and animal types. Appropriate to the natural conditions ie without irrigation and other articifial interventions.
P114 Priority order	Adjust the prority orderto: a, c (other values), b(stock)	See above about appropriate land use activities.	Reorder the priority list to put stock below other values.
P118	It is good to see "efficient use" is stated		
P119 Unused allocation	Unused water allocation should be permanently reallocated to tge natural environmental allocation.	By reallocating to the environmental allocation, so the environmental health can be improved and the resilience of all other user's supplies can be enhanced.	Change the policy to put unused water allocations into the environment's allocation.
P121 Allocation	Allocations and river health need to recognise the probable effects of climate change on flows and variability.	I have a great concern that as Climate Change bites, so the agricultural industry will get more demanding and greater conflict will occur as they try to take more and thereby further degrade the environmental allocation.	Build in flexibility and clauses that can reduce the allocation to agriculture as climate change effects increase the need for resilience in the natural water systems.

P 130 Bores	Include specific mention of Ground Source Heatpumps and the need to ensure any bores associated with them do not compromise the intregrity of aquifers and water bodies.	I was involved in writing the Best Practice guide for Ground Source Heat Pumps a while ago. Knowing the care and attention that is required to install a Ground Source Heat Pump properly without ruining ground water supplies, and the lack of skill and care present in the heat pump installation industry, I am very concerned about the negative effects of this technology. If I had it my way I'd ban them.	Put in a mention of bores for ground source heat pumps, and put some really strong controls around this. The USEPA has some good rules around these activities.
P132 Removal of Structures	Is there value in leaving derelict structures in place if they are providing useful protective habitats without causing any other environmental problems?	It occurs to me that dive wrecks and articifical reefs provide good habitats and so there is a potential for other similar structures in rivers, and lakes potentially providing the same sort of ecological benefit.	Recognition that some structures will be providing valuable habitat and it may be worth leaving them in place in special circumstances.
P138 Structures	There is no mention of marine energy devices	Marine Energy devices in some cases are below the surface and so could potentially be sited in such places and provide a benefit to their local community.	Include a comment about marine energy devices (at least those that are below the water surface)

Rules - Air quality	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
R2 Frost protection Devices	I thought they were just big electricity wasting fans?	Puzzlement.	Is that right? I was not aware they had any emissions.
R32 (g)	There needs to be some monitoring of spray drift and contamination around the property – cost to the property owner doing the spraying.	Concern that the good practices are not followed.	Include continuous monitoring of spray drift onto neighbouring areas.

Rules - Land use	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
R102 Forestry	This is not quite related but still... There needs to be come reference to Carbon Sink forestry and the beneficial'ness of this activity	At present carbon sink forestry does not make financial sense however it probably will in a few years time IF proper mechanisms are put in place to encourage natural carbon sequestration. This plan needs to be aware of this possibility.	Include a statement on Carbon Sink forests – esp their desirability in erosion prone land (seeing as they are permanent forests.)

Rules - Wetlands and beds of lakes and rivers	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
P126 Dams	This probably does not quite belong here but... There needs to be provision for removal of silt from dams in order to refurbish them or lengthen their life.	Refurbishing an old dam and lengthening the life of a dam is better than building a new one right?	A statement in the rules about the suitability of silt removal from old dams as part of refurbishment or dam maintenance.

Other methods	My submission on this provision is:	Reasons for my submission:	I seek the following from WRC (give precise details):
M17 Waste reduction	Fabulous – plenty of this is needed.		