

## View Submitter Details

<b>Submitter No.</b>	S105
<b>Submitter Name</b>	Hannah Bridget Gray (No2) Trust
<b>Online submitter</b>	Yes
<b>Raw submission lodged</b>	Yes

## Raw submission points

These are submission points that were lodged as part of an online submission. They have not been summarised.

Raw sub point number	Provision	Support/oppose	Decision sought	Reasons
S105.1	Impervious surfaces	Amend	<ul style="list-style-type: none"> <li>roof areas with rainwater collection and reuse</li> <li>any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)</li> </ul>	The NRP Change 1 specifically addresses discharge from impervious surface and how to manage them, in an aim to encourage thoughtful design and use of surfaces in development and redevelopment of all built areas. Use of rain tanks, grey water reuse systems or any form of water collection and reuse should be encouraged as a responsible and environmentally friendly use of water rather than included in calculations as if it were environmentally damaging.
S105.2	Redevelopment	Amend	Amend the definition in line with the Porirua City Council's submission point on this provision.	I support Porirua City Council's submission point on this provision.
S105.3	2.2 Definitions	Amend	Provide a clear definition of what constitutes "woody vegetation".	<p>The Plan Change 1 repeatedly provides "woody vegetation" as a target state but does not specify what that actually means. See</p> <p>9.2.1. Ecosystem of health and water quality P.P2(g) 9.2.4. rural land use and earthworks P.P20(3), P.P22(c)(i)</p> <p>Given the emphasis on land owners reaching this state, clarity here is important. If this phrase is defined another piece of legislation, then it should be referenced in a manner similar to "Harvesting", "Intensive grazing" etc.</p>
S105.4	Highest erosion risk land (pasture)	Amend	Provide a clear definition of what Highest erosion risk land (pasture) is rather than referring to a point in time map.	<p>The Plan Change 1 requires landowners measure the net change in area of highest erosion risk (pasture) land. However, the definition refers to a specific map taken at a point in time. This</p> <ul style="list-style-type: none"> <li>- does not effectively enable land owners to accurately judge the impact of any actions they may take</li> <li>- does not enable farm environment plan certifiers to be able to accurately evaluate annual farm plans if the GWRC are not up to date</li> <li>- creates a large reliance on regular GWRC re-mapping activities</li> <li>- and significant time lag between land owners taking action and finding out the net change / results of their action.</li> </ul> <p>Given the emphasis on land owners taking action, ensuring land owners understand the practical definition of this phrase would be appropriate.</p>
S105.5	High erosion risk land (pasture)	Amend	Provide a clear definition of what High erosion risk land (pasture) is rather than referring to a point in time map.	<p>The Plan Change 1 requires landowners measure the net change in area of high erosion risk (pasture) land. However, the definition refers to a specific map taken at a point in time. This</p> <ul style="list-style-type: none"> <li>- does not effectively enable land owners to accurately judge the impact of any actions they may take</li> <li>- does not enable farm environment plan certifiers to be able to accurately evaluate annual farm plans if the GWRC are not up to date</li> <li>- creates a large reliance on regular GWRC re-mapping activities</li> <li>- and significant time lag between land owners taking action and finding out the net change / results of their action.</li> </ul> <p>Given the emphasis on land owners taking action, ensuring land owners understand the practical definition of this phrase would be appropriate.</p>
S105.6	Wastewater network catchment or sub-catchment	Amend	Amend the definition in line with the Porirua City Council's submission point on this provision.	I support Porirua City Council's submission point on this provision.
S105.7	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Retain as notified	
S105.8	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Retain as notified	
S105.9	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	Retain as notified	
S105.10	Method M43: Supporting the health of urban waterbodies.	Amend	Amend the definition in line with the Porirua City Council's submission point on this provision.	I support Porirua City Council's submission point on this provision.

S105.11	Method M44: Supporting the health of rural waterbodies.	Amend	Amend the definition in line with the Porirua City Council's submission point on this provision.	I support Porirua City Council's submission point on this provision.  I strongly support having methods that provide incentives for people to comply rather than relying solely on regulatory enforcement. In particular, I support rates relief for people who are consciously making an effort towards revegetating their land. To date this has failed to be recognised by local authorities such as Porirua City Council or national bodies such as QV.
S105.12	Method M45: Funding of wastewater and stormwater network upgrades	Amend	Amend the definition in line with the Porirua City Council's submission point on this provision.	I support Porirua City Council's submission point on this provision.
S105.13	Policy P.P8 Avoiding discharges of specific products and waste.	Amend	Clarify when animals are considered confined	The current wording of point (b) would apply to every fenced paddock on every farm in the Wellington region and every house with a dog inside a fenced area, as the large majority of domesticated animals are by necessity confined to a fixed area. I doubt this is the intent of this rule. Provide clarity as to which type of scenarios are being targeted.
S105.14	Policy P.P10: Managing adverse effects of stormwater discharges.	Amend	Develop a more comprehensive policy, including acceptable solutions and technical specifications.	Support in principle the encouragement of hydrological control and water sensitive urban design measures.  However, this policy seeks to mandate the use of said controls, without defining what acceptable hydrological controls are. This makes the policy vague, open to interpretation and likely open to challenging which is a poor use of landowners, developers and regional council staff's time.
S105.15	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Amend	Amend the definition in line with the Porirua City Council's submission point on this provision.	I support Porirua City Council's submission point on this provision.
S105.16	Rule P.R25: Farming activities on properties of between 4 hectares and 20 hectares – permitted activity.	Support	Retain as notified.	Support in principle.
S105.17	Rule P.R16: Vegetation clearance on highest erosion risk land–permitted activity.	Amend	A definition of pest plants is required.	There are many different pest plants within the region, and (as noted in the s.32 report) some pest plants such as Gorse should be considered carefully before removal as it acts as a nursery for native vegetation. Clarity over what is considered a pest and what is not is required.
S105.18	Earthworks	Amend	<b>For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only:</b>  The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts <b>or clearing of drains and culverts</b> . Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.	Good farming practice is to have clear and functioning drains that ensure water is channel appropriately towards filtration plantings, does not undermine steep areas (contributing to erosion) and is effectively and quickly channeled to more approach catchments. Drain and culvert maintenance often require clearing out of sediment or earth, but should not be considered earthworks - the amount of earth moved would be similar to installing a fence post.
S105.19	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	<b>1. stabilising stream banks by excluding livestock (as defined in the Resource Management (Stock Exclusions) Regulations 2020) from waterbodies and planting riparian margins with indigenous vegetation, and</b>	As has been proven before, the impact stock have on waterbodies and riparian margins is entirely dependent on the type of stock in question (e.g. sheep vs cattle or deer).  This should maintain consistency with the National Regulations for stock exclusion which apply to beef cattle and deer only on mapped low slope land <a href="https://environment.govt.nz/acts-and-regulations/regulations/stock-exclusion-regulations/">https://environment.govt.nz/acts-and-regulations/regulations/stock-exclusion-regulations/</a> <a href="https://data.mfe.govt.nz/layer/111150-stock-exclusion-low-slope-land-2022/">https://data.mfe.govt.nz/layer/111150-stock-exclusion-low-slope-land-2022/</a>
S105.20	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	B. Management Objectives  Clarify how target states apply if the highest erosion risk land (pasture) areas are not contiguous	Maps 90-95 (Maps 90-95: Erosion risk areas for pasture, plantation forestry and woody vegetation, Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua) appear to have areas as small as ~5m wide. In many cases, these "dots" are singular and by themselves.  A 5m area (or 25m2) could be covered by one to two trees (depending on species) and would likely not fit many more. It is unclear at what point a 25m2 spot would be considered "revegetated".
S105.21	Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	E. Erosion Risk Treatment Plan (1)  can reasonably be expected to reach canopy cover of at least 80% per <b>hectare of the total area of any highest erosion risk land (pasture)</b> within 10 years of being established, and	Maps 90-95 (Maps 90-95: Erosion risk areas for pasture, plantation forestry and woody vegetation, Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua) appear to have areas as small as ~5m wide. In many cases, these "dots" are singular and by themselves.  It is unreasonable to set a per hectare target based on this, given a hectare is significantly larger than many of the areas identified as being at risk. Instead, like other targets set it should be prorated / based on the original total area identified at risk.

## Raw submission documents

These are files that were uploaded as part of an online submission.

Document name	File	Description	Upload date
Example of individual, non-contiguous highest risk erosion areas	<a href="#">screenshot20231214at11.20.08pm.png</a>	Each square is 5m by 5m. This is a good example of where a per-hectare target (80% canopy cover) does not make sense.	14/12/2023 23:24



