

Proposed Natural Resources Plan:

Submitter:

**Rural Residents Environmental Society
Incorporated**

Submitter Number:

S125

Introduction

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

1.5 Factors shaping this Plan

We support council taking a restrictive presumptive or precautionary approach to activities including discharges which are to land and air which are from recreational, commercial or retail activities. There are activities which discharge hazardous materials to land and air which lead to contaminated sites and dust, vapour and particles which are harmful to human health and animal life.

Amend

We would like a regional rule which restricts or prevents the discharge of hazardous materials to land or air which is not from trade and industrial processes.

1.5.1 Statutory framework

There is overlap between the responsibilities of Regional Councils and Territorial Authorities (TA) which sometimes leads in gaps in the plans and responsibilities of the different jurisdictions.

Amend

We would like a statement which indicates that Regional Council will develop Memorandum of Understanding or Agreements with TAs to ensure that plans are coordinated and that processes are developed to ensure resource consents are jointly processed when activities involve responsibilities of two or more jurisdictions.

Interpretation

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

	<p>Amend</p>

There is no definition of a contaminated site or land

Reinstate the definition in the draft plan

Objectives **My submission on this provision is:** **Reasons for my submission:** **I seek the following from WRC (give precise details):**

Objective O1: Ki uta ki tai	Amend	Air is omitted	Include air as objective O1 refers to the total spatial relationship.
Objective O2: Importance of land and water	Amend	Air is omitted	Include air in objective O2. Poor air quality reduces the well being of the community.
Objective O3: Mauri	Amend	Mauri includes air and land	Include air and land in the objective.
Objective O40: Adverse air quality	Support	The environment needs to be defined more	Add bees, organic horticulture and tree crops
Objective O43: Contaminated land	Amend	Contaminated land should be remediated and protect vertebrate life	Contaminated land is remediated and managed to protect human health, and protect vertebrate and invertebrate life.
Objective O44: Land use impacts on soil and water	Amend	This is weak and does not prevent the development of further contaminated sites	Amend to read: Land use activities will not create a contaminated site.
Objective O51: Hazardous substances	Amend	This is weak and does not prevent the development of further contaminated sites	Amend to read: The discharge of hazardous substances to land is managed to protect human health, property, and the environment and will not create a contaminated site.

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Policies	Reasons for my submission:	I seek the following from WRC (give precise details):
Policy P2: Cross-boundary matters	There is overlap between the responsibilities of Regional Councils and Territorial Authorities (TA) which sometimes leads in gaps in the plans and responsibilities of the different jurisdictions.	We would like a statement which indicates that Regional Council will develop Memorandum of Understanding or Agreements with TAs to ensure that plans are coordinated and that processes are developed to ensure resource consents are Need also to consider the effects of the environment on the activity. Wairarapa has strong wings and this can affect discharges to air.
Policy P3: Precautionary approach	We strongly support this approach.	Good management practices should use the best international practices where they are more rigorous in protecting the environment than New Zealand industry best practice or common practice
Policy P4: Minimising adverse effects	Good management practices are supported	Add after ...discharge contaminants to land, air, fresh water ...
Policy P5: Review of existing consents	Review of existing consents can be made under section 128 RMA 1991 not just for water, it should apply for any conditions which do not comply with consent	Add to Policy 52 reference to protection of beneficial animals and shall not pose risks to organic production or fruit or vegetables.
Policy P52: Managing ambient air quality	Restricting air quality to human health and safety does not recognise the effects of discharges on animals particularly beneficial insects. Discharges carried by the air can also affect the organic status of property and be deposited on commercial	Reword Policy 55: Air quality in urban, rural and the coastal marine areas shall be managed to prevent or where not practicable to minimise offensive, hazardous or objectionable odour, smoke and particulate matter, vapour fumes, ash and
Policy P55: Managing air amenity	The policy should be to eliminate where possible rather than minimise and should also include vapour. It should also include hazardous.	Policy P59: Hazardous point source discharges. The significant adverse effects from I point source discharges of hazardous air pollutants beyond the boundary of the property where the discharge is occurring, including any noxious or dangerous
Policy P59: Industrial point source discharges	Restricting this to only industrial discharges is too restrictive. It is the effect which is important irrespective of how it is caused.	Policy P90: Discharges of hazardous substances. The discharge of a hazardous substance to land (including accidental discharges), fresh water, including groundwater, or coastal water from the use, storage and transport of hazardous substances shall be prevented or where this is not possible to be managed by the use of good management practices. We have covered the issue of best management practices previously.
Policy P90: Discharges of hazardous substances	We strongly support this policy and feel it can be made more rigorous and prevent long term contamination of land.	

<p>Policy P95: Discharges to land</p>	<p>Support</p>	<p>We strongly support this policy. We would prefer that this also covers preventing the effects on vertebrate and invertebrate life. We are also concerned by the term "minor" and recommend that this is defined in this context.</p>
<p>Policy P96: Managing land use</p>	<p>Amend</p>	<p>This policy is vague and difficult to understand.</p>
<p>Policy P150: Noise and lighting</p>	<p>Amend</p>	<p>We believe that the Regional Council should also have a policy on Noise and Lighting. These are currently covered by District Plans but they are very variable and inconsistent and do not necessarily meet the requirements of the RMA to regulate the adverse effects of noise and light</p>

Amending the policy as follows: (e) avoiding or minimising effects on public health and amenity, vertebrate and invertebrate animal health, and (f) not resulting in a discharge that enters water including ground water.

Policy P96: Managing land use. Rural land use activities for production and residential purposes is recognised and shall be managed using good management practice.

New Policy P150: Noise and lighting Noise shall be controlled so as not to cause nuisance to sensitive areas. Exterior lighting shall avoid being directed at sensitive activities, streets, roads and navigation tracks and shall minimise effects on other users and wildlife, unless it is for operational health and safety reasons.

Rules - Air quality

My submission on this provision is:

I seek the following from WRC (give precise details):

Rule R41: All other discharges – discretionary activity

Support

We strongly support this policy, however it may not be strong enough for hazardous contaminants which cause long term contamination and which should be classed as a non-complying activity. We suggest an additional Rule

Rule R42: Other discharges hazardous substances – non-complying activity. The discharge of hazardous substances into air that are not permitted, controlled, restricted discretionary, discretionary prohibited is a non-complying activity.

Rules - Discharges to water

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Rule R68: All other discharges – discretionary activity

Support

We strongly support this policy, however it may not be strong enough for hazardous contaminants which cause long term contamination and which should be classed as a non-complying activity. We suggest an additional Rule

Rule R69 All discharges of hazardous substances – non-complying activity The discharge of hazardous substances into water, or onto or into land where it may enter water, that is not permitted by Rule 68 is a non-complying activity.

Rules - Discharges to land

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Rule R93: All other discharges to land – discretionary activity

Support

We strongly support this policy, however it may not be strong enough for hazardous contaminants which cause long term contamination and which should be classed as a non-complying activity. We suggest an additional Rule

Rule R94: Discharges of Hazardous Substances to Land – non-complying activity. The discharge of hazardous substances onto or into land that are not permitted, controlled, restricted discretionary, discretionary is a non-complying activity.

Rules – Land use

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Rule XXX Gun pistol or rifle ranges including Clay Target Shooting Ranges – non-complying activity. The use of land for Gun pistol or rifle ranges including Clay Target Shooting Ranges is a non-complying activity.

We recommend the addition of a new land use rule to cover Clay Target Shooting Ranges, Gun Ranges and other forms of shooting ranges. They are identified specifically on the Hazardous Activities and Industry List (HAIL). They are recognised as producing long term contamination of the land. The shooting ranges use ammunition containing lead and other heavy metals. Clay targets contain Poly Aromatic Hydrocarbons. The spent lead and targets contaminate the land making the soil unusable. The lead is toxic to vertebrates and invertebrates, including bees, worms and birds. It enters the food chain which causes death to grazing animals and higher order carnivores such as falcons and harriers. The dust and vapour produced is spread by the wind. It is a proven health hazard to the shooters and human health. The dust and vapour leaves the site and impacts on surrounding properties, organic production and fruit, vegetable and honey production. Shooting Ranges are also extremely noisy and prevent local residents from enjoying their properties. The presence of the large number of firearms also poses some risk to the community. As a single group of activities they have a significant adverse impact on the environment and amenity. As such they should have their own rule to regulate them as a non-complying activity.

Amend

Other methods

My submission on this provision is:

Reasons for my submission:

I seek the following from WRC (give precise details):

Method M12: Sustainable land management practices

Support

We support the promotion of good management practices and suggest that these be the best management practices.

We can supply examples of international best practice management for clay target shooting ranges.

Method M13: Wairarapa water races

Support

We support this and recommend that for consistency that the Regional Council leads discussions on a single authority to be responsible for all Wairarapa Water races.

Method M16: Contaminated land

Amend

We recommend that the Regional Council works with territorial authorities to remediate contaminated rural land to return it to productive use.

Method M28: Development of good management practice guidelines.

Support

We can supply examples of international best practice management for clay target shooting ranges.

Schedules

My submission on this provision is:

I seek the following from WRC (give precise details):

Schedule F: Ecosystems and habitats with significant indigenous biodiversity values

Amend

The Moroa Water Race does not appear to be included. It contains eels and koura and probably other vertebrates and invertebrates.

