

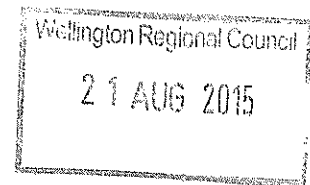
Proposed Natural Resources Plan:

Submitter:

Egon Guttke

Submitter Number:

S14



Egon Guttke
6 Glengavel Grove
Papakowhai
Porirua

21/8/2015

Greater Wellington Regional Council

Dear Sir/Madam

Submission on the Draft Natural Resources Plan for the Wellington Region

Together with my wife, I own a 220 ha block of land that is significantly affected by the provisions of the draft plan.

When we acquired the land in 1992, it was marginal farmland showing some signs of erosion, and had a very low biodiversity due to grazing activities and the impact of pests. We converted around 80 ha to plantation forest, and one of the results has been a much improved water quality in the streams on our property. Flooded creeks are now very rare, due to the forest retaining a large amount of water.

The forest has generated substantial employment and benefits for the local economy

Over the last 20 years, I have - supported by DOC - invested a large amount of time in possum and general pest control. We are also using a local hunter to manage the wild pig population. This resulted in an increase in biodiversity for my land, and e.g. Kereru is now a common sight, were it was initially quite rare.

In a nutshell, I believe that I have been a good custodian for the land and the natural environment. The draft plan is too restrictive and some of the provisions are an obstacle to economic activity in the rural sector. But as an unintended consequence, it also penalises landowners such as myself who have looked after the land (and water) by introducing many onerous rules.

Some of my key concerns relate to the schedules and the mapping of various protection layers for the Waikanae river headwaters above GPS reference 178 1550.60 / 547 5221.92.

A General Comments

The draft plan does not provide sufficiently for a balance between the economic activity required for the wellbeing of community and the need for protecting natural resources. Most of the rules are rigidly focused on the protection of the environment, yet ignore that this can take place only in the context of a prosperous community and with the support of local landowners. Forestry is a good example, in that it provides environmental benefits

by reducing erosion, improving water quality and carbon sequestration. Yet at harvest time forestry will potentially have a negative effect on the environment. The provisions for earthworks are such that forestry will now often become uneconomical due to the very high costs introduced – e.g. spoilage from harvesting roads needing to be carted away. The consequence will be that the next best land use is grazing, which has a much more negative impact on the environment

There is often no analysis, why those rules are needed, and this is perhaps best borne out by the very large number of waterways designated as having significant ecosystems (Schedule F). Pretty much all hill country streams are captured in schedule F, showing that there is no need to apply further restrictions in this area, as the current rules have worked well. Ironically, where there is a shortage of clean water or biodiversity, those restrictions do not apply. This generally true for most non hill country areas

The draft plan needs to enable emergency as well as health and safety related work without the rigors of having to obtain resource consent. As shown by the damage caused by the recent heavy rains in the Wanganui region, and also in the Horo hill country, slips may need to be removed immediately from a riverbed irrespective of the spawning period of a fish species.

Water bodies with clean water are given labels such as “significant ecosystems and habitat”, “trout river”, “water protection zone”, “recreational water body” etc – yet there is no evidence that show that further protection of such water bodies is needed. They have good water quality precisely because land owners have looked after them – whether they are private or not. There is another argument, that especially smaller water bodies (streams) with good water quality are proliferating our region and are not rare.

The electronic copy draft plan is really a series of PDF (or word) documents. This makes it very difficult, to search for key words in the plan, e.g. when trying to identify the implications of a definition such as a “sensitive area”

C Definitions

Erosion prone land is defined as land with a slope > 20 %. This is much more stringent than the current Regional Soil plan, where erosion prone is defined as : “any land within Area 1 (see definition) with a slope greater than 23 degrees; and any land within Area 2 (see definition) with a slope greater than 28 degrees”

The National Environmental Standard –Plantation Forestry is going to use the New Zealand Land Resource Inventory (NZLRI), a spatial database describing key attributes of the land resources of New Zealand: rock, soil, slope, erosion susceptibility and vegetation. It is used by many district and regional councils and provides more certainty to landowners and better assessment of the risk than a crude slope based approach.

Changing the definition as proposed, will significantly move the goal post by declaring much more land than previously as erosion prone – which will then be covered by more stringent rules. There has been no justification provided nor is there any further detail in

the section 32 reports on this. E.g. how many more ha of land do now fall into the erosion prone category? What are the incremental expected costs to landowners, agriculture and forestry, considering also the implications for district plans and their specific rules regarding erosion prone land?

Taking into account the report by Sorensen (2012) where he states that “most of the region’s soil is intact and there has been a slight increase in stable and inactive land surfaces due to the revegetation of some former erosion scars..”, there is no justification for the change in definition.

Relief sought: The definition should not be changed and be consistent with the Regional Soil plan. Alternatively, the erosion susceptibility classification used by Landcare and contained in the draft NES-Plantation Forestry could be used

C Objectives

0) General

I propose a general statement expressing that measures combating climate change, such as carbon sequestration or the generation of energy from renewable resources, is supported.

1) Objectives O24, O26 & Table 3.4

The objectives can be interpreted as to interfere with private property rights. The headwaters of streams are often entirely on private property. An example are the headwaters of the Waikanae River. Any contact recreation, Maori customary use or taking of food would require the property owner’s agreement. There is no public interest in Objective O24 & O26, where a water body is entirely on private land, and water quality objectives are already expressed elsewhere.

Relief sought: Objectives O24 and O26 should be altered to exclude water bodies and headwaters entirely on private land.

The table has a requirement for Mahinga kai and taonga species to be present in appropriate quantities. The objective is unclear, as the species are not listed. The relevant species should be identified. Further, I do not see that this outcome is applicable to water bodies on privately owned land (e.g. the headwaters of the Waikanae River) or which are on publicly owned, protected land (e.g. the Otaki river within the Tararua Forest Park), where the taking of such species is generally not permitted.

Relief sought: List Mahinga Kai and taonga species

2) Objective O33

The Objective should reference Schedule C. The objective to restore such sites needs to be tempered with the economic impact of such a restoration

Relief sought: insert “(see Schedule C)” following the word “values”

replace “restored” with “and consideration will be given to restoration where practicable”.

3) Objective O35

Where it comes to the restoration of ecosystems and habitats, the economic impact of such a restoration needs to be considered. There cannot be an overriding priority for restoration irrespective of the costs

Relief sought: replace “restored” with “and consideration will be given to restoration where practicable”.

D Policies

- 4) Policy P7: To The issues listed in the policy are potentially competing with each other, as is to be expected. What is missing is a more general approach to the productive use of land. The policy is written as to protect certain commercial interest, by putting restrictions/costs on other land uses which do not consume water. An example are the earthworks provision. Why would aquaculture or food production be more important than forestry? Forestry delivers substantial benefits with respect to water quality, erosion control, and carbon sequestration, yet is not listed in P7.

Relief sought: Forestry should be included in the list of land and water uses.

- 5) Policy P10: Policy 10 is in essence contained in policy P7. If maintained as a separate Policy, then P10 appears to give priority to contact recreation and customary use when competing with other interests. This is not borne out by the RMA, which requires that e.g. economic benefits are also taken into account.

Relief sought: delete Policy P10

6) Policy P17

It is not clear, what the policy is trying to achieve. Clause (f) says that the mauri should be enhanced and sustained – yet how do I, as an affected member of the community, know what activity enhances the mauri. The bank of a river is going to be armoured with rocks to reduce erosion of the bank – is this beneficial to the mauri? What are the measures used – and if there are no measures, how do we know that the mauri it is sustained?

I do not think it is appropriate to leave this to an ad hoc interpretation on a case by case basis.

Relief sought: Better define what specific properties of a water body are affected by Policy P17

7) Policy P18

In P18 (a) it is proposed to have “particular regard to the values...”. The RMA requires giving consideration to a range of factor when the use of resources is evaluated. The wording appears to give priority to Maori values, and especially, where private ownership of the land is concerned this is not justified.

Relief sought: remove the word “particular” from policy P18 (a)

Policy P18 (d) refers to the implementation of kaupapa Maori monitoring. If this is to happen also on private land, than it will require the agreement of landowners, otherwise the monitoring should be restricted to public areas

Relief sought: add at the end of P18(d) “for publicly accessible resources”

8) Policy P32

This policy appears to largely duplicate policy P31. It is also in conflict with policy P31 (f). If for example weeds need to be removed from a water body in order to improve the natural habit, then this may well have short term significant effects – which are to be avoided in accordance with P32.

P32 (d) requires the use biodiversity offsetting, where there are residual adverse affects. The will always be residual adverse effects, and this clause should only become effective if there are **significant** residual adverse effects.

Relief sought: Remove policy P32

Alternatively: add the word “significant” before the word “residual” in P32 (d)

9) Policy P33

Depending on the species mix present, it may be impossible to avoid the negative effects of activities. Also, some activities (and their impacts) cannot be avoided, e.g. it may be necessary to remove a slip across a river bed, to install a culvert or to undertake flood control measures.

Relief sought: following the word “avoided”, the words “where possible” should be inserted at the end of first sentence.

10) Policy P40

If an ecosystem or habitat has significant biodiversity values, then these should be protected, or improved where practical. As it stands the policy ignores the costs of restoration; currently not even the GWRC is eradicating introduced weeds from streams or possums as it is not economically feasible

Relief sought: remove reference to restoration from the policy, and add at the end of the policy “.. and improved ,where practical”.

11) Policy P44

The policy makes reference to restoration – who would carry the cost of such a restoration, and what about the effect on private property rights? I suggest to clarify that this does not apply to private land.

Relief sought: add the end of policy P40: subject to the consideration of private property rights.

E Rules

General: The rules are sometimes overly complex, resulting in unnecessary restrictions, e.g. There are often minimum distances and specified, when really the issue is whether a contaminant will drain into a watercourse, and this is governed as much by the lie of the land (e.g. ridges) as the distance from a water body.

Some rules refer to distances from a “gully”. This should be removed, as pretty much all hill country is covered by gullies – there would be very little land left without any restriction. Where a gully is part of a water body, it will be covered under that term, and where it is not, (a “dry “ gully) then there should be no restriction.

12) Rule R42

The rule is a major change to the status quo. Currently, sediment control measures are only required for bulk earthworks. Forestry requires earthworks which will at times generate some runoff including sediment. The rule implies that this will not be permitted if the suspended solids exceed 50 grams/m³. This really only 50 parts/million, or 0.005%. It will be pretty much impossible to achieve, and even a car driving through a ford will have a greater impact. A more practical approach would be to remove the 50gr and 100gr limit and just focus on water quality the zone of reasonable mixing.

The rule does not define any water quality standards with respect to the chemical or bacterial content of the water and this is at least as important as the sediment content.

Relief sought: remove reference to 50grams/m³ and 100grams/cubic meter

13) Rule R67

The rule makes discharge of e.g. clean water from a roof onto land where it may enter an outstanding one of the many rivers in Schedule F1 a non-complying activity, as the rule only refers to the permitted activities under rules R42-R45.

Under rule R48 the discharge of rainwater from a roof is permitted, and this rule should also be referenced in rule R67

Relief sought: add rule R48 to clause (b)

14) Rule R71

The current rules operate satisfactorily – there is not pollution from pit latrines in remote areas, and introducing the proposed rules would make it impossible for many land owners to build a batch. When a 20 m distance from a water body was sufficient in the past, why is it now proposed to be extended to 50 meters? There is no justification in the section 32 reports for the proposed change

The key issue with respect to pit latrines is that they should not pollute water, especially drinking water. The rules are very specific, yet do not capture this properly. E.g. if a pit latrine is closer than 50 m to a surface water body or gully, it may still have nil effect if it sits on the other side of a ridge. Rule 71 would also affect many huts operated by the Department of Conservation as the 50m distance requirement from gullies or water bodies would not be met

Relief sought: replace rule R71 with the corresponding rule in the operative plan

15) Rule R72

The wording in clause (c) should be altered to say: “the discharge does not drain into a surface water body..”. Otherwise my comments for rule R71 apply

Relief sought: replace the wording in clause © by “the discharge does not drain into a surface water body”

16) Rule R99

The wording of the first sentence, especially “where it may enter water from earthworks” is not clear

Relief sought: clarify the meaning of the first sentence.

17) Rule R101

The wording of the first sentence, especially “where it may enter water from earthworks” is not clear

Relief sought: clarify the meaning of the first sentence.

18) Rule R102 & R103

In general I support making plantation forestry a permitted activity.

Rule R102 applies to forestry on erosion prone land. Rule R103 then stipulates that otherwise, plantation forestry is not a permitted activity. The wording of those two rules and what is intended is unclear.

The requirement for a harvesting plan should only apply for larger blocks of forest – there is no need for a plan when a farmer harvests a shelterbelt or a few hectares of trees. I suggest to only require a harvesting plan for areas exceeding 10 ha, as this currently operates satisfactorily within the Kapiti District.

Relief sought: Make forestry on non erosion prone land a permitted activity
Clarify the wording of the first sentence in Rule R102 & Rule R103
Exclude the harvesting of less than 10 ha in a calendar year from the need to submit a harvesting plan to the Wellington Regional Council

19) Rules R112 to R124

There needs to be an exception for emergency or health and safety related work covering these rules. E.g. 5.5.4 (e) and (f) do not allow work at certain periods – yet a culvert or a slip may need to be cleared with urgency during a heavy rainfall event to avoid flooding or risk to life. This is well evidenced by the heavy rain falls in the Wanganui region, and also in the Tararua foothills – it is just not feasible to apply for resource consent, when time is of the essence

Relief sought: To insert a provision into the above rules allowing emergency maintenance and repair work.

20) Rule R114

The rule affects not just the construction, but also the use of river crossings. If a river crossing such as a bridge is in existence, then the use of this bridge is surely permitted. If a new bridge is to be build, then either it requires consent, or it is permitted. In both cases the use of the bridge will also be permitted. To include the “use of any river crossings” in the rule is overregulation.

Relief sought: remove the words “or use” from rule R114

What is the rationale for a 50 ha catchment limit on the western side of the Ruamahanga river? There is no justification provided in the section 32 report.

It is not clear why a resource consent is required to bridge a small river, but putting in a culvert with some metal on top is a permitted activity. A bridge would be better environmentally, and should be permitted, wherever a culvert is permitted.

Relief sought: I suggest to either remove clause (f) or, as a minimum, have a uniform 200ha catchment limit.

Otherwise, I support the approach of enabling landowners to establish small river crossings with a minimum of regulation

21) Rule R115

I do support this rule

22) Rule R116

The rule is in itself inconsistent and is too restrictive: Given the maximum capacity of 20 000 cm³, a 20 ha catchment does not make sense. Elsewhere a 200 ha catchment has been used and this would be more appropriate.

Given the catchment restraints, a small dam could only be build in the absolute headwaters of rivers, but there is no reason in the section 32 report, why a small dam should not be permitted further downstream, provided the passage of fish is assured. Small dams can even improve water quality, and reduce sediment downstream.

More importantly, they are essential to provide a water supply for firefighting. Most plantation forests are in hill country, where there are no other sources of water for firefighting. It would be impossible to retain water for firefighting purposes, and this is not just an economical but also a health and safety issue.

Relief sought: I request to replace the 20 ha catchment limit by a 200 ha catchment limit. At the same time, it may be possible to restrict the volume of the retained water to significantly below 20000 m3 and use a limit of say 5000 m3.

F Other Methods

23) Method M7

The process described includes consultation with “interested parties”.

The effect of labeling a river as “outstanding” has a major impact on properties. Also the assessment of rivers will require the cooperation of land owners, especially where the headwaters are concerned.

I also am concerned about a potential change in criteria without any consultation with the rural community and affected land owners.

The described process removes planning certainty, and can be seen as misleading, as many people will not comment on aspects of the plan where it currently does not affect them, only to find that some time later – because criteria have been changed - they will be affected

Relief sought: The words “interested parties” should be changed to “affected parties”.

Schedule B & GIS mapping

The headwaters of the Waikanae River above where it crosses the Mangaone walkway have been in private ownership since before 1890. No customary rights have been exercised since then, and there is no evidence supporting the details listed as taongas for this part of the river.

In fact the language used is very vague and refers e.g. to “certain sites” or “certain ceremonies” rather than identifying the sites and ceremonies. Another taonga appears to be the high quality of the water in context with its use as a source for drinking water for the district. Water quality is a general public good, and the drinking water

supply is protected in the district plan through other means – so there is no reason for its inclusion here

There has been no treaty settlement affecting the headwater of the Waikanae River, and it is not appropriate to affect private property rights in the absence of such a claim

Relief sought: exclude the headwaters of the Waikanae River upstream of its crossing with the Mangaone Walkway from Schedule B.

Schedule F

It is not clear how the criteria in Schedule F1 have been derived from Policy 23 in the Regional Policy Statement.

Almost all hill country streams are included in Map 13, showing that for hill country, at least the criterion for Representativeness in Policy 23 is not met. The mapping within the GIS includes all headwaters, although the minimum flows required for the listed species in Schedule F1 will not be achieved in these headwaters

Relief sought: to set a minimum flow requirement, and exclude those headwaters and tributaries from Schedule F1, which do not meet this requirement

Schedule F includes the Waikanae River and all tributaries. I am particularly concerned about the headwaters of the Waikanae above GPS reference 1781550.60 / 547 5221.92, and my further comments under this heading relate to this area.

A) At Risk and migratory species: The river here is quite small, and does not meet the criteria shown, simply because the MALF, which is approximately 30 l/sec, is too small. The “Instream Habitat Assessment for the Waikanae River” on Councils website identifies 810 l/sec as the minimum flow required to sustain the indigenous fish habitat. Minimum flows for specific species have been identified in the Cawthron Institute Report “Implications of different minimum flows in the Waimea river” (2013), but it is quite clear that at a MALF of 30 liter/sec or less there is no habit for most of the listed species

This is even worse for the “tributaries” mapped out, as these are often just trickles or ephemerals.

The Waikanae in this area does not contain six or more species of migratory fish, and the fish species listed as having been recorded in the catchment, do not apply to this specific area. Even using Councils own data from the publication “Can Fish Fly”, this specific area does not contain torrentfish, koaro, shortjawed koaro, giant kopu or banded kokopu.

The NIWA fresh fish database has no records that any of “indigenous fish recorded in catchment” are present in the Waikanae River upstream of GPS reference 178 1550.60 / 547 5221.92, so there is no evidence that the criteria related to habit are being met. The NIWA fresh fish database has some catches recorded perhaps 2 kilometers downstream from this point, and it should be noted that here, the water volume has dramatically increased due to four tributaries joining together.

Incidentally, there is dam blocking any fish species perhaps 500 m downstream of GPS reference 178 1550.60 / 547 5221.92. (see the attached photo 1)

- B) High macro invertebrate community health: More than 70% of the catchment of the Waikanae in this area is covered in Plantation forest – so by councils own definition the criterion for high macroinvertebrate health is not being met upstream of GPS reference 178 1550.60 / 547 5221.92. I have attached an image showing the relevant catchment

Relief sought: There is no evidence supporting the inclusions of the headwaters of the Waikanae within Schedule F and I do request to remove the headwater of the Waikanae upstream of GPS reference 178 1550.60 / 547 5221.92 from Schedule F1 and the GIS mapping. It may also be appropriate to exclude the area downstream of this point up to where the Waikanae crosses for the first time the Mangaone Walkway as much of the reasoning above also applies. Also, this would reduce the administrative and mapping work involved for Council.

Schedule I:

The schedule, together with Map 26 shows trout habitats and trout spawning waters. The headwaters of the Waikanae above GPS reference 178 1550.60 / 547 5221.92 do not contain trout, due to the low MALF. Also migration of trout and other species into this area is inhibited by a small dam further downstream (see the attached Photo 1).

Relief sought: I do request to remove the headwater of the Waikanae upstream of GPS reference 178 1550.60 / 547 5221.92 from Schedule I and the GIS mapping system. It may also be appropriate to exclude the area downstream of this point up to where the Waikanae crosses for the first time the Mangaone Walkway, as much of the reasoning above also applies. Also, this would reduce the administrative and mapping work involved for Council.

Mapping of the Waikanae River

Waikanae River has been extended from the operative plan – where it is shown to begin at GPS ref. 178 1286.00 / 547 6476.05. If there is no specific evidence other

than the 1:50 000 maps, then I suggest that for the purposes of this plan the starting point of the Waikanae river - as mapped in the operative plan - is retained.

Relief sought: it is requested to retain the starting point of the river as documented in the GIS for the operative plan at GPS ref. 178 1286.00 / 547 6476.05

Map 20

The schedule shows primary contact recreation rivers. The headwaters of the Waikanae above GPS reference 178 1550.60 / 547 5221.92 are entirely privately owned with no public access, so there is no opportunity for contact recreation by anyone other than the land-owners. Also, the Waikanae here is only a trickle and unsuitable for this purpose. The same applies to the land downstream from that point until it reaches the Mangaone Walkway, where it is joined by several tributaries. It is here where it begins to be accessible and to grow to a size where it could be used for primary contact recreation.

Relief sought: I request to remove the Waikanae River upstream from where it crosses the Mangaone Walkway from Map 20

To: Freepost 3156
 Wellington Regional Council
 PO Box 11646
 Wellington 6142

Or email: regionalplan@gw.govt.nz

Wellington Regional Council
 21 AUG 2015
 #1519624

Your details

Full name: Egon Guttke

Organisation name:
 (If applicable)

Address for Service: 6 Glengavel Grove
 Papakowhai, Porirua 5024

Telephone no's: Work: Home: 04 2370177 Cell:

Contact person:

Address and telephone no (if different from above):

Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We will send you updates on the process, information and provide you with details of any meetings and the hearing. Please tick here if you do not agree to receive communication via email.

Email address: egon.guttke@paradise.net.nz

Trade competition

I/we could not gain an advantage in trade competition through this submission. [Go straight to **Your 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.

Your submission

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	

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If you have more submissions you wish to make, please find more boxes at the bottom of this document

Attendance and wish to be heard at hearing(s)

- I/We do wish to be heard in support of my/our submission
[Note: This means that you wish to speak in support of your submission at the hearing(s).]
- 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 others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature: _____

Date: _____

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

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Legend

- Basemap
- Placenames - Towns
- Placenames - Suburbs
- Placenames - Localities
- Placenames - Bays

Map Services

Active Layer(s)

- Drawn Graphics
- Basemap (24)

Basemap

Slide to change transparency of layer

100%

Draw and Measure

No Tool Selected

Selected Graphics

