

S12/040
 S119/038
 with regard
 Rule R136 take and use of water - permitted activity

1. In her section 42A report on water allocation I believe the officer has not taken on board the full impact of the definition of "property" as used in the PNRP or more significantly the red line version as recommended and the effect this has on our property and I am sure many others.

Property	<p>Any contiguous area of land or freehold title in one ownership</p> <p>Property means any contiguous area of land, including land separated by a road or river, held in one or more than one ownership that is utilised as a single operating unit, and may include one or more certificates of title.</p>
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2. We currently own a property of 265Ha with 4 separate dwellings (that's 4 vegetable gardens 4 lots of fruit trees, new shelter belts, vehicles to clean etc), and while the current R136 is intended to allocate a reasonable quantity of water above that needed for stock and domestic needs it is assumed on the basis of a rural property with a single dwelling.
3. Under the original definition it restricts the use of this water 20m³ over all 4 dwellings. Under the Red line definition the property now includes the additional 140Ha that is leased and that is farmed as one operation this includes a further 2 dwellings with the associated needs. Larger properties should not be over penalised due to a expectation that they will utilise the resource.
4. And while I somewhat agree with the officer par426 "*given that as a permitted activity the effects of the activity, including cumulative effects need to be managed by the conditions of the rule.*" I do not consider the relationship with ownership of property size and function have been considered.
5. Under the proposed R136 if we were to appropriate the take too all 6 dwellings at the 20m³ (there are 7 titles involved) the allocation would be 120m³. Under my proposed additional 4m³ / 20Ha (fig 2) additional area rule: 20m³ plus ((425-40)/20=19), 19*4=76 plus 20 would equal 96m³.
6. The concern by many is that this would represent a large volume of water where in reality when considered by the area involved it is minimal. For example if it was used for irrigation it could only effectively irrigate 1.92Ha. 0.45% of the area from which it is sourced.

7. Taken to the other extreme if the 2.5L/s was to be utilised 24hrs per day, (216m³ per day) property size would max out at 1020Ha and the area that could be effectively irrigated 4.32Ha.
8. This seems to me too be a small compensation to those properties that are charged with ensuring they fence off, riparian plant, and allow access to the water that runs through or that resides under the properties.

Relief sort

Rule R136: Take and use of water – permitted activity

The take and use of water from a **surface water body** (other than a **water race** that is permitted by Rule R138) or ground water is a permitted activity, provided the following conditions are met:

- (a) the total take and use per **Property** shall not exceed the following rates and volumes, and

Property size	Rate	Volume per day
Less than 20Ha	2.5L/s	10m ³
Greater than 20Ha Less than 40Ha	2.5L/s	20m ³
Greater Than 40Ha	2.5L/s	4m ³ / 20Ha additional area

- (b) the take of groundwater does not adversely affect reliability of supply from properly constructed, efficient and fully functioning nearby bores, and
- (c) where the take and use is from surface water body, a fish screen with a minimum mesh size of 3mm shall be installed to prevent fish entering the intake fish are prevented from entering the water intake, and
- (d) the water is not taken from a natural wetland, or from within 50m of a natural wetland, and
- (e) no water shall run to waste, and

at the written request of the Wellington Regional Council a water meter is installed and daily water use records are kept and provided to the Wellington Regional Council.

S12/041

S119/040

with regard

Rule R137 Farm dairy washdown and milk-cooling water - permitted activity

9. With the permitted use of water for dairy shed milk cooling and washdown water effectively no longer available this rule in its current form requires any future dairy operation (whether this be cow, sheep or goat) to be a consented operation on the availability of water. As stated many times (par445) most catchments have a full allocation and so this effectively stops the ability of a landowner to choose the farming system that he may choose to be the most economical for his location and land type.

10. This seems a little absurd considering the small volume of water that is required.

Dairy cow example

70L/head/day

(Wairarapa average)

2.8 cows/ha

132Ha

366 Cows

$366 * 70 = 25.62m^3$ per day (fig 2)

At all times this water is effectively restricted by the animal effluent discharge consent that is required under Rule R83

11. Again if we relate this to effective area irrigated 0.51Ha. And if you consider at this stocking rate that for every 1Ha of Milking platform there is generally at least 0.5Ha to 1Ha of support land. (young stock grazing, supplement harvest and Cow wintering). This seems to me too be a small compensation to those properties that are charged with ensuring they fence off, riparian plant, and allow access to the water that runs through or that resides under their properties.

12. The same could be applied to other species dairy operations: Goats or Sheep. And while I am unsure of their particular requirements it would be fair to say their requirement for milk cooling and washdown would be relatively the same based on a Stock unit basis. (eight stock units per dairy cow), recommended change (*The total take shall be no more than 70L per day per stock unit based on the maximum herd size on the property*)

Relief Sort

Rule R137: Farm dairy washdown and milk-cooling water –permitted activity

The take and use of water from a **surface water body** (other than a **water race** that is permitted by Rule R138) or ground water for the purpose of farm dairy washdown and milk cooling on a dairy milking platform is a permitted activity, provided the following conditions are met:

- (a) The take shall be for a single **property**, and
- (b) The total take shall be no more than 709L per day per stock unit based on the maximum herd size on the **property** ~~at any time during the three years prior to the date of public notification of the Proposed Natural Resources Plan (31.07.2015)~~, as controlled by Rule R83
- (c) the take of groundwater does not adversely affect reliability of supply from properly constructed, efficient and fully functioning nearby **bores**, and
- (d) where the take and use is from surface water body, a fish screen with a minimum mesh size of 3mm shall be installed to prevent fish entering the intake ~~fish are prevented from entering the water intake~~, and
- (e) the water is not taken from a natural wetland, or from within 50m of a natural wetland, and
- (f) all practicable measures for recycling of uncontaminated washdown-milk-cooling¹ water are implemented, and
- (g) at the written request of the Wellington Regional Council a water meter is installed and daily water use records are kept and provided to the Wellington Regional Council.

Note

Water taken for dairy washdown and cooling water may be taken in addition to water taken under Rule R136.

In respect of condition (b) the Wellington Regional Council holds a record of the maximum herd size on the property using information obtained from the property owner in compliance with a resource consent obtained under Rule R83.

S12/043

S119/042

with regard

Rule R143: Temporary water permit transfers - controlled activity

13. To make the best possible use of the limited water allocation and to make the most efficient dynamic use of the resource we see the need for the ability to transfer water permits without the bureaucratic cost in time and money to facilitate water sharing and temporary transfer.
14. The matters of control are in essence the requirements needed to be a permitted activity, if water user groups are to be encouraged/endorsed they need to be readily able to move the water around.

Relief sort

Rule R143: Temporary water permit transfers - permitted activity

S12/045

with regard

Policy P115 Authorising takes below minimum flows and lake levels

Support the rewording of Policy P115 and the subsequent change of Schedule P to Table 4.1

Fig 1

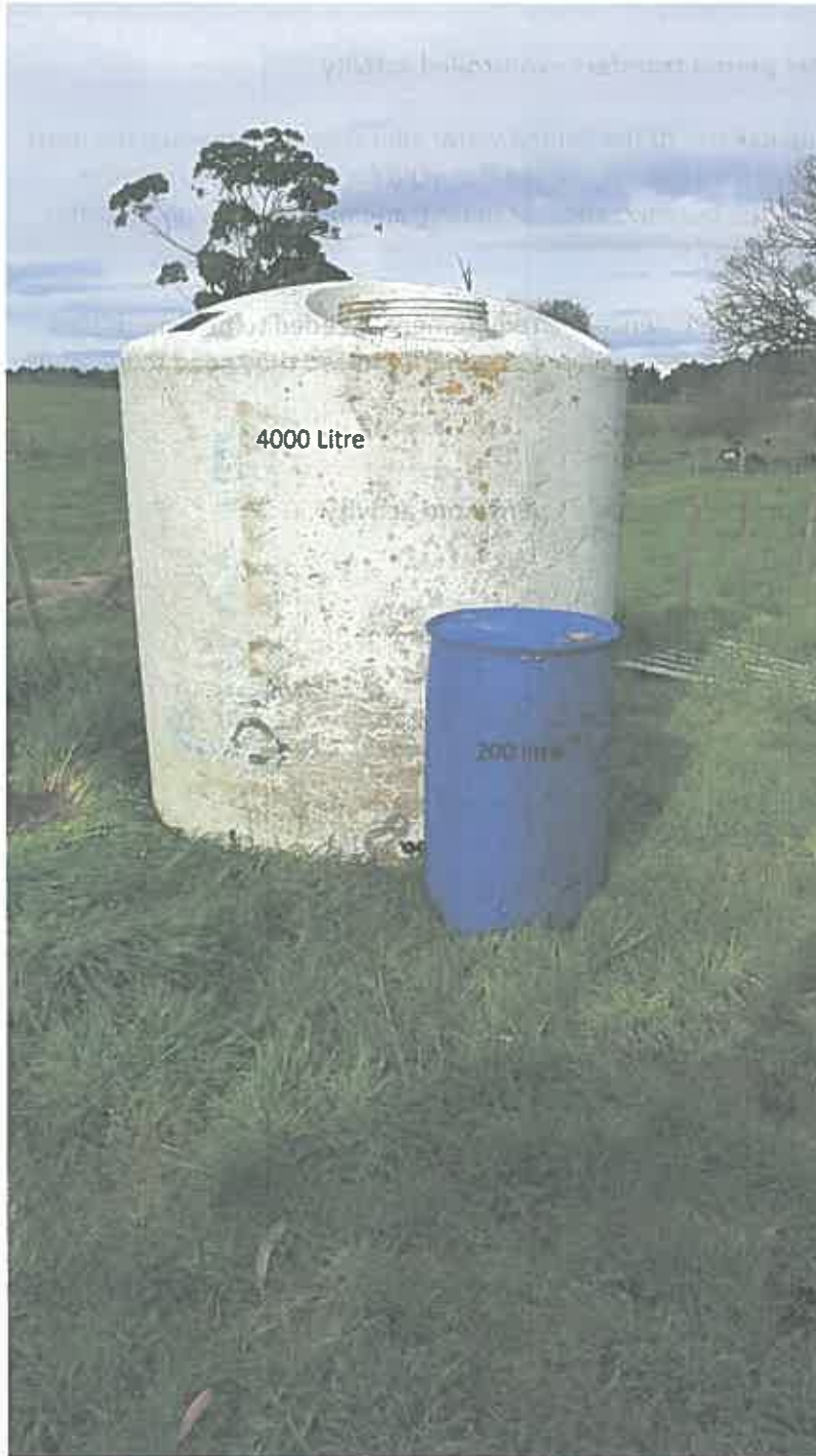


Fig 2



