

Submission of Waa Rata 152



Our property: wet and hilly

- High rainfall on western foothills of Tararua Ranges (about 1.8m rainfall/year – approx 2x the coast)
- Nearly all streams, drains and wet areas on our property disappear underground and do not flow into the river – most, if not all year round
- We have troughs in every paddock (ca 20) and take water for stock drinking
- Our property has an area of outstanding natural landscape identified in the proposed district plan

“Natural Wetlands” referred to in many places, eg...

- Notified O17: ‘The natural character of the coastal marine area, rivers, lakes and their margins and **natural wetlands** is preserved and protected from inappropriate use and development’
- Notified P48: “Protection of outstanding natural features and landscapes” includes natural wetlands
- Notified P37: “Activities in and adjacent to **natural wetlands** shall be managed to maintain their values...”
- S42A Report amends P25: “Use and development shall avoid significant adverse effects on natural character in...**natural wetlands**”

“Natural Wetlands” definition

- Western foothills of Tararua Ranges has many wet areas because of the ephemeral flow paths
- Definition of ‘Natural Wetlands’ includes wet areas predominated by exotic species: *intermittently wet area, shallow water and land water margin that supports a natural ecosystem of plants and animals that are adapted to wet conditions*

Policy 48: Protection of outstanding natural features and landscapes

Notified P48: "The natural features and landscapes (including seascapes) of the coastal marine area, rivers, lakes and their margins and natural wetlands shall be protected from inappropriate use and development by..."

- S42A Report says: *"As the identification of outstanding natural features and landscapes is still being undertaken, I do not recommend any changes to Policy P48"* (para 383)
- We do not consider wet areas of exotic species are intended to be considered outstanding
- On this basis, we recommend deleting 'natural wetlands', OR amending 'natural wetlands' definition

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Suggestion amendments to 'Natural Wetlands'

Definition: Is a permanently or intermittently wet area, shallow water and land water margin that supports a natural ecosystem of plants and animals that are adapted to wet conditions, including in the beds of lakes and rivers, the coastal marine area (e.g. saltmarsh), and groundwater-fed wetlands (e.g. springs). Natural wetlands do not include: damp gully heads, or wetted pasture, or pasture with patches of rushes, or...

- We propose inserting 'indigenous' in definition to read '*...supports a natural indigenous ecosystem of plants and animals...*'
- Propose inserting underlined text in sub-clause (a): *damp gully heads, or wetted pasture, or pasture with patches of rushes or exotic species adapted to wet conditions*

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Policy 49: Use and development adjacent to outstanding natural features and landscapes and special amenity landscapes

- S42A Report says: *Policy 49 manages use and development in the CMA; where that is adjacent to an outstanding natural feature or landscape or special amenity landscape identified in a district plan" (para 403)*
- As plan users we did not find this clear and we recommend amending the policy heading to refer to the Coastal Marine Area

Notified Policy 37 Values of Wetlands

- P37: *'Activities in and adjacent to natural wetlands shall be managed to maintain their values including...'*
- Given the broad scope of 'natural wetlands' definition (including exotic species adapted to wet conditions), recommend deleting 'and adjacent to' OR amending definition of 'natural wetlands'



Matters of consistency

- Policy 30 (relating to natural buffers) refers to 'wetlands' but other policies refer to 'natural wetlands'
- Its unhelpful to use different terms across different policies and we suggest consistency
- It is difficult for plan users to switch terms between provisions

We recommend consistent use of 'natural wetlands'

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Policy P107: Framework for taking and using water

- Support S42A proposed amendment to Policy 107 that inserts additional clause:

– *(d) Permitted and controlled activities provided for in the Plan and section 14(3)(b) and 14(3)(e) takes are not included in the allocation amounts or subject to minimum flows or water levels.*

- Because it clarifies water allocation includes an individual's reasonable **domestic needs**, and reasonable needs of an individual's **animals drinking water**



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