

Notes for NRP submission 29 05 2017

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#### R112 Replacement of Structures

- Needs to allow or nearby subject to similar/same physical characteristics. E.g. bridge
- Ability for more discretion

#### R114 River Crossings

- Bridge, BC required
- Catchment area not big enough
- Clause g) in or on the bed - structure – clarify. Abutments, piers or bridge
- This could trap everything
- Confusion/courts/officers and pedantics
- 5.5.4 clause l) – no diversion.
- What if water is already out of channel
- What standard

#### R115 Culverts

- 0.3 – 1.2m is a small diameter
- Clause iv). Diameter or width at least as wide as the “river bed’
- This definition issue again
- Basically has the potential to exclude all but a few culverts, for example if using a cattle underpass as a culvert
- Potentially not compatible with clause k) part ii).
- Headwater drives the operation of a culvert

#### R116 Small Dams

- Clause l) not compatible with current building regs. 4m and 20,000l.
- 20 ha catchment is small.

#### R121 Drains and cleaning. This is a shambles

- Opening comment says a farm drain or highly modified river or stream.
- Clause e) refers you to clause 5.5.4 which references a river or lake bed being read to also include an artificial farm drainage canal – this is different from the opening comment.
- Now excludes highly modified river or stream.
- What is what!!
- This is solely designed for lawyers and courts. More confusion and argument.
- Property owners and contractors are too scared to clean owing to the uncertainty and inconsistent actions that have been taken by GW.
- Clause j). Becomes operative in July this year – two months time!!
- Parts i) and ii) of this clause. Many have built fences, riparian planting, etc on one side or the neighbours’ boundary so can only clean from one side.
- Then part ii) worst case if cleaning middle (more likely that digger can get at this section) must leave minimum of 0.3m on each side (0.6m overall). Not much if anything left in middle to work with.

- I am sure you will be aware there is much debate in the industry regarding this. There is huge frustration. People are really pissed off.
- Get best industry practice using knowledgeable industry people and not some theoretical box ticker. What is the real problem?
- I have heard that some senior people involved with writing this section thought diggers walked backwards along down in the drain or on top of it cleaning it. They work from the banks.
- This is control to the n th degree, is very costly.
- This stance will tend to reverse the work done in earlier days to drain land and make it productive. It is likely that a small margin should not have been drained but this would not apply universally.
- In April this year (a wet month), I saw water flowing over paddocks when the nearby water course was not full of water but was choked along both sides with weed.

General.

In my work I am regularly encountering very honest and competent property owners suggesting that is it worth having a go at doing their work without a consent because the cost, time and hassle or working through the authority is horrendous. I say no, but it annoys me to be saying that in most cases.

I am not a planner but I hear from many planners that the RMA and its administration is meant to be permissive and there to deal with genuinely potential harmful things. It appears to not be getting used that way. People perceive it as a make work scheme.

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I have many times had GW consents people tell me they don't care about cost.