

Proposed Natural Resources Plan:

Submitter:

Woodridge Homes Limited

Submitter Number:

S105

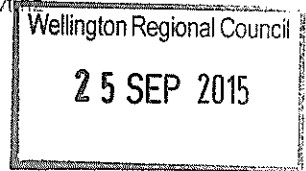
Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region
This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to

Clause 6 of Schedule 1, Resource Management Act 1991



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

Or email: regionalplan@gw.govt.nz



Your details

Full name: Woodridge Homes Ltd
Organisation name: _____
(If applicable)
Address for Service: Cardno, PO Box 38098 Wellington Mail Centre, Lower Hutt

Telephone no's: Work: (04) 8969104 Home: _____ Cell: 0210631999
Contact person: Rhys Phillips

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: rhys.phillips@cardno.co.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): Section 5.1- Air Quality	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<p>There is no permitted rule for air discharges from cleanfill sites, as a result they would be a discretionary activity under Rule R41 – All other discharges.</p> <p>The materials disposed of in cleanfills must meet the waste acceptance criteria of the Ministry for the Environment's "Guide to the Management of cleanfills" (January 2002). No contaminated material can be accepted and therefore the only likely discharges are stormwater and dust.</p> <p>Provided the dust generated from the cleanfill does not adversely affect an adjoining property owner these discharges should be permitted.</p>
	I seek the following decision from WRC (give precise details): →	Add a permitted rule for air discharges from cleanfills.

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): Rule R42 and Rule R48	My submission on this provision is: →	<input checked="" 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: →	<p>A 100g/m³ limit of total suspended solids discharged into other areas is a more realistic and achievable target.</p> <p>R42 – There needs some clarification in the rule as to whether or not stormwater is excluded from this rule. Stormwater is also covered by Rule R48.</p>
	I seek the following decision from WRC (give precise details): →	Retain 100g/m ³ limit, add wording to R42 to clarify that stormwater discharges are covered by R48.

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): Rule R50 and R51	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<p>All District Council stormwater networks will require a higher level of management due to these rules. It is envisaged that the requirement to obtain the appropriate discharge consents will be passed onto developers by the District Councils and Wellington Water Ltd.</p> <p>The wording of any future discharge permit would need to be extremely carefully considered.</p> <p>Rule 48 permits the discharge of stormwater into the existing system. A discharge consent which is specific to an area or sets restrictive quality limits may be breached by adding additional stormwater from the roves, driveways and roads of future developments (which is permitted). Who would be responsible for this? the new house owner? or the District Council as the</p>

		holder of the discharge permit? Would a new consent be required or a variation to the existing consent?
	I seek the following decision from WRC (give precise details): →	The workability of these rules and their implications for developers and District Councils needs to be further considered and explained.

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): Rule R54, R55 and R56	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<p>R55 – It is highly unlikely that the discharges from a contaminated site would meet (b)(i) Drinking Water Standards New Zealand 2005 (revised 2008). Setting such a high standards will ultimately result in the vast majority of discharges from contaminated sites being a discretionary under R56.</p> <p>The rule may have unintended consequences. Taking a strict interpretation the rule does not allow stormwater discharges from roofs or hard surfaces on the ground. These discharges, which are unlikely to meet the drinking water standards, due to animal inputs and surface hydrocarbons, may not come into contact with the "contaminated" areas of the land at all. Regardless of this, simply because they originate from a contaminated site they are a discretionary under R56.</p>
	I seek the following decision from WRC (give precise details): →	Consider a less restricted standard for discharges of stormwater from contaminated sites.

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:

Hugh Phillips (for Cardno at Rof Woodridge) Date: 25/9/15

[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:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): Rule R115 and R114.	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<p>Culvert is not defined in the interpretation section. Therefore, it is unknown what constitutes a culvert and what is able to be placed in a river bed with a maximum length of 20m.</p> <p>Many of the areas yet to be developed around the region have steep valleys where compliance with the 20m length requirement at the same time as District Council road gradient requirements is not possible. The max length of 20m is too restrictive and should be amended to take this into consideration.</p>
	I seek the following decision from WRC (give precise details): →	Define culvert. Delete 20m length and replace with the wording 'the formed culvert crossing shall be no wider/longer than necessary for the crossing'.

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): Rule R119(k)	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	The inclusion of (k) effectively prevents the removal of sand, shingle, rock which in the majority of the cases is what is causing the blockage of the stream/stormwater system.
	I seek the following decision from WRC (give precise details): →	Either delete or amend to allow removal of this material down to the natural bed level.

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): Rule R112	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<p>The use of the words "excluding any cable, pipe or duct" in permitted activity condition (g) makes R112 unclear. This can be interpreted in two ways: either pipes are excluded from the rule as they are "excluded", or that they are excluded from the 1m projection and 5% plan or cross sectional area requirements and as a result there is no limit on cable, pipe or duct length under permitted activity condition (g).</p> <p>Correspondence from Council indicates that it the latter. However this raises additional issues as R112 requires compliance with either (f) "or" (g). If (g) does not apply then (f) must be complied with and under (f) any maintenance, repair and replacement work must be contained within the form of the original structure. As a result no extension of a pipe, cable or duct would be permitted under this rule. Which is counter intuitive as (g) specifically provided for extensions to structures and Rules R115 and R117 permit new structures.</p> <p>We understand that the inclusion of the words "excluding any cable, pipe or duct" is linked to Rule 28 of the Regional Freshwater Plan (RFP) where permits the construction of such structures across intermittently flowing streams. However, the wording is confusing and as the end result would</p>

		appear to be a situation where such structures are a discretionary activity under rule R129. We note that Rule R112 also needs to consider the situation of an existing in stream culvert being extended.
	I seek the following decision from WRC (give precise details): →	Reconsider and clarify the wording of Rule 112 to make the extension of cables ducts and pipes a permitted activity. This could include deleting the words "excluding any cable, pipe or duct" from permitted activity condition (g). Alternatively the wording could be amended to read "excluding any <u>overhead</u> cable, pipe or duct" to better align it with Rule 28 of the RFP.

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): Rule R127	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	Development of urban land and in particular greenfield areas often requires the partial reclamation of stream in order for the land to be developed, this is acknowledged by Council in Policy 102.
	I seek the following decision from WRC (give precise details): →	Add a new rule which makes the reclamation of streams for the development of urban land and in particular development in greenfield areas a discretionary activity.

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): Policy 102	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<p>Policy 102 – Reclamation and drainage of the beds of lakes and rivers indicates that reclamation need not be avoided where the land has been identified as a special housing area or is associated with a growth and/or development framework approved under Local Government Act (2002).</p> <p>Not all areas identified for urban development are specifically identified as a special housing area or approved under Local Government Act (2002). The policy should not be so specific and should simply apply the to all areas identified for urban development under a District Plan.</p>
	I seek the following decision from WRC (give precise details): →	Amend and apply the policy to all areas identified for urban development under a District Plan.

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): Interpretations	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	No definition of culvert, reclamation or pipe
	I seek the following decision from WRC (give precise details): →	Provide a definition of culvert, reclamation and pipe in the interpretation section.

