

Submitter ID:

File No:



greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

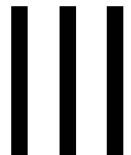
Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

MR Smith

ORGANISATION (* the organisation that this submission is made on behalf of)

Waa Rata Estate

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

149 Terrace Road
Reikorangi
RD1 Waikanae
Kapiti 5391

PHONE

FAX

EMAIL

waa.rata@xtra.co.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

We are owners of 60 hectares of land directly impacted by many provisions in the PNRP that have implications for our ability to sustainably manage natural and physical resources and specifically provide for our social, economic and cultural wellbeing, and health and safety while enabling activities that safeguard the life supporting capacity of ecosystems. This includes provisions that other submitters have suggested adding, deleting or amending either in part or full.

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature: MR Smith

Date: 20/3/2016

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|--|---|--|---|---|
| Name of person/ group making original submission and postal address. | The original submission number can be found on the submitter address list. | Whether you support or oppose the submission. | Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Why you support or oppose each submission point. | The part or whole of each submission point you wish to be allowed or disallowed. |
| <i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood | <i>e.g.</i> submitter S102 | <i>e.g.</i> Oppose | <i>e.g.</i> Oppose all of submission point S102/41 | <i>e.g.</i> The submission point does not recognise... | <i>e.g.</i> Disallow the parts of S102/41 relating to... |
| Federated Farmers | 352 | Support | Page 3 'Critical Recommendation' | It is imperative to the quality, efficiency and effectiveness of the regional plan that it be informed by a robust and thorough social impact assessment. | Allow the recommendation |
| Federated Farmers | 352 | Support | 1.4 Integrated Catchment Management, page 7 | Improving functionality and accessibility of the plan for users will improve the effectiveness of the administration of the regional plan. | Allow the relief |
| Federated Farmers | 352 | Support in part | 1.5.1 Statutory Framework, page 7 | It is important that errors in the pNRP are corrected, and it is appropriate to refer to national level guidance regarding the NPS-FW to assist WRC staff and plan users. | Allow the relief to enable errors to be corrected and national level guidance to be referred to |
| Federated Farmers | 352 | Support in part | 1.5.2. Community views, Scientific and Technical Information – identifying issues, page 10 | It is important that the regional plan be informed by a robust and thorough assessment of cost-benefit of options. | Allow relief to enable a detailed cost – benefit analysis of options prior to the hearing |
| Federated Farmers | 352 | Support | 1.6 Values of Water in the Plan, page 11 | It is appropriate to refer to national level guidance regarding the NPS-FW to assist council staff and plan users. | Allow the relief |
| Federated Farmers | 352 | Support in part | Table 1.1 Values of Water, page 12 | The inclusion of animal drinking water is an important value. | Allow the relief to enable the inclusion of animal drinking water as a value |

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| Federated Farmers | 352 | Support | 2.1.4 Other Methods, page 15 | It is appropriate to view the rules framework within the broader context of other methods rather than viewing rules first and separately from this context. | Allow relief to set out Other Methods as part of the context in which rules sit |
| Federated Farmers | 352 | Support in part | 2.2 Interpretation, Category 2 surface water bodies | Appropriate to exclude ephemeral and intermittent water bodies given they appear and disappear in an <i>ad hoc</i> manner, particularly in areas where there are high rain falls. | Allow relief in part |
| Federated Farmers | 352 | Support | 2.2 Interpretation, Earthworks | Important that people are able to maintain farm tracks and that these are excluded from the definition of earthworks as it is fundamental to the sustainable management of natural and physical resources and to enable people to provide for their health and safety. Similarly important and practical to be able to maintain drains to ensure they are workable. | Allow relief |
| Federated Farmers | 352 | Support | 2.2 Interpretation, Erosion Prone Land | Submitter's amendments to definition of Erosion Prone Land (especially as it relates to the western side of the region). | Allow relief |
| Federated Farmers | 352 | Support | 2.2 Interpretation, Good Management Practice | Submitter suggests some practical amendments to the definition to make it more workable. | Allow relief |
| Federated Farmers | 352 | Support | 2.2 Interpretation, Gully | Submitter notes the need to clarify the definition of 'gully' or otherwise have it deleted. Broadness of definition makes it unworkable because it captures extensive areas with likely unintended consequences. | Allow relief |
| Federated Farmers | 352 | Support | 2.2 Interpretation, High Risk Soils | Submitter notes the need to clarify the definition of 'high risk soils' or otherwise have it deleted. Lack of clarity means it is likely to have | Allow relief |

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| | | | | unintended consequences, particularly given the reference to 'slope'. | |
| Federated Farmers | 352 | Support | 2.2 Interpretation, Livestock | Support the submitter's tighter definition of 'livestock'. | Allow relief |
| Federated Farmers | 352 | Support in part | 2.2 Interpretation, Natural Wetlands | Support the insertion of 'gullies' and 'hill country seeps' and 'sedges' from the excluded items to ensure greater clarity of the definition. High rainfall areas (eg in hill country and foothills) can very quickly be considered natural wetlands simply because it is yet again raining. | Allow relief in part |
| Federated Farmers | 352 | Support | 2.2 Interpretation, Offal Pit | Support the exclusion of in-situ burial of single carcasses. (The alternative is not to bury them.) | Allow relief |
| Federated Farmers | 352 | Support | 2.2 Interpretation, Restoration and Management Plan | Support the refined approach to the definition. The pNRP's limited approach to the definition and it being tied to other schedules is inappropriate. | Allow relief |
| Federated Farmers | 352 | Support in part | 2.2 Interpretation, River Class | Inserting 'and length of accrual period' adds greater specificity to the definition. | Allow relief in part |
| Federated Farmers | 352 | Support in part | 2.2 Interpretation, Sensitive Area | Appropriate to exclude 'public places' as it is unclear what this term encompasses. For example, it could include roads (where hazardous substances are transported) and other areas where the public has access. Also appropriate to exclude 'community drinking water supply protection area' from definition. | Allow relief in part |

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| Federated Farmers | 352 | Support in part | 2.2 Interpretation, Significant Natural Wetland | Important for there to be consistency between the regional plan, the Regional Policy Statement and Biodiversity Strategy. Important that wetlands have been appropriately assessed. | Allow relief in part |
| Federated Farmers | 352 | Support | 2.2 Interpretation, Silage | Appropriate to exclude 'baleage' from the definition of silage given its different nature. | Allow relief |
| Federated Farmers | 352 | Support | 2.2 Interpretation, Stock crossing point | Stock crossing points are not always able to be located on banks directly opposite each other, for example, if the terrain is such that it is not possible. Appropriate to delete the relevant provision given there are likely to be circumstances where it is unworkable. | Allow relief |
| Federated Farmers | 352 | Support | 2.2 Interpretation, Stock drinking point | Support the inclusion of a definition for a 'stock drinking point' to ensure provisions appropriately support animal welfare and best practice management. | Allow relief |
| Federated Farmers | 352 | Support in part | 2.2 Interpretation, Surface Water Bodies | Appropriate to refine the definition to exclude a 'drain' or 'water race'. These features have an ephemeral nature, particularly in hill country areas, and it would be in line with the exclusion of 'ephemeral' water bodies. | Allow relief in part |
| Federated Farmers | 352 | Support in part | 2.2 Interpretation, Vegetation Clearance | Support the refinement of the definition to exclude handheld methods, and to clarify its relationship to rule 100. | Allow relief in part |
| Federated Farmers | 352 | Support | 0.7 Stock water, page 29 | Support the refinement this provision to help ensure animal welfare and best practice management. | Allow relief |

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|--|-----------------------------------|-----------------|--|--|----------------------|
| Federated Farmers | 352 | Support | 0.8 benefits of take and use of water, page 30 | Support the amendment to recognise the role of water storage. | Allow relief |
| Federated Farmers | 352 | Support | 0.9 recreation, page 30 | Support the amendment to recognise the interface between recreation relating to natural features and role of landowners and the community. | Allow relief |
| Federated Farmers | 352 | Support | 0.10 public access, page 30 | Important for there to be consistency with the regional policy statement. Support the amendment to recognise the interface between recreation relating to natural features and role of landowners and the community. | Allow relief |
| Federated Farmers | 352 | Support | 3.5 Water quality, O23 maintain or improve, page 33 | Important for there to be consistency with the NPS-FM. | Allow relief |
| Federated Farmers | 352 | Support in part | Table 3.4 Rivers and Streams, pages 37 and 38 | Support amendments to improve useability of table and to insert accrual periods. | Allow relief in part |
| Federated Farmers | 352 | Support | Sites with Significant Values, O31 outstanding water bodies and O32 outstanding natural features and landscapes, page 41 | Important for there to be consistency with the NPS-FM and Regional Policy Statement. | Allow relief |
| Federated Farmers | 352 | Support | Sites with Significant Values, O35 significant indigenous biodiversity, page 44 | Important for there to be consistency with the Regional Policy Statement, and Biodiversity Strategy. | Allow relief |
| Federated Farmers | 352 | Support | Sites with Significant Values, O38 special amenity landscapes, page 44 | Matter covered in Regional Policy Statement and dealt with by district plans. Inappropriate to duplicate regulatory provisions, creating additional complexity. | Allow relief |

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|---|----------------------------|-----------------|---|--|---|
| Federated Farmers | 352 | Support | 3.10 Land Use, livestock access to waterbodies, page 47 | Support intention to seek appropriate balance given the need for livestock to have access to drinking water, and the ability to move stock around farms which - given the very different characteristics of each farm - can create significant challenges particularly in high rainfall areas. | Allow relief to enable greater balance to be achieved |
| Federated Farmers | 352 | Support | P8 Beneficial activities, page 57-58 | Submitter indicates that a broader range of activities need elucidating. This is very important. It is very concerning activities have been overlooked in the pNRP including removal of invasive fauna. | Allow relief to enable a wider range of activities to be included |
| Federated Farmers | 352 | Support in part | P42 ...Restoring Ecosystems and Habitats..., page 70 | Support cross referencing the policy to Schedule F to give it greater specificity, as well as greater intention on managing adverse effects of introduced species. | Allow relief in part |
| Federated Farmers | 352 | Support in part | P43 Restoration and Management Plans, page 71 | There may be times when it is appropriate to carry out activities with adverse effects that are more than minor but managed in conjunction with a restoration management plan. | Allow relief in part |
| Federated Farmers | 352 | Support | P48 Protection of Outstanding Natural Landscapes and Features, page 72 | Important for there to be consistency with the Regional Policy Statement. | Allow relief |
| Federated Farmers | 352 | Support | P49 Use and Development Adjacent to Outstanding Natural Features and Landscapes and Special Amenity Landscapes, page 72 | Important for there to be consistency with the Regional Policy Statement. | Allow relief |

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| Federated Farmers | 352 | Support in part | P69 Human Drinking Water Supplies, page 77 | Appropriate to avoid, remedy or mitigate to the extent practicable. | Allow relief in part |
| Federated Farmers | 352 | Support | P99 Livestock access to surface water bodies, page 82 | Support intention to seek appropriate balance given the need for livestock to have access to drinking water, and the ability to move around farms which - given the very different characteristics of each farm - can create significant challenges particularly in high rainfall areas. | Allow relief |
| Federated Farmers | 352 | Support | P107, P111, P112, P113, Framework for taking and using water, page 84-85 | Support submitter point to ensure the regional plan is consistent with the intention set to use the whitua process for establishing the framework for taking and using water. | Allow relief |
| Federated Farmers | 352 | Support | 5 Rules, default rules, page 87 | Appropriate to apply more graduation in the activity status of different activities. | Allow relief |
| Federated Farmers | 352 | Support | R48 Stormwater from an individual property, page 89 | Appropriate that the rule is proportionate to effects and has practical application. | Allow relief |
| Federated Farmers | 352 | Support | R75 New or upgraded on-site wastewater systems, page 94 | Appropriate to permit new or upgraded wastewater systems in community water drinking protection area. | Allow relief |
| Federated Farmers | 352 | Support | R76 New or upgraded on-site wastewater systems within community drinking water supply protection areas | Appropriate to permit new or upgraded wastewater systems in community water drinking protection areas. | Allow relief |
| Federated Farmers | 352 | Support | R91 Offal Pit, page 99 | Makes the provisions more workable in practice. | Allow relief |

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| Federated Farmers | 352 | Support in part | R97, Access to the Beds of Surface Water Bodies by Livestock, page 102 | <p>Support reference to power or water supply break downs or other emergencies.</p> <p>Support amendment of reference to the regional plan being operative rather than notified to allow the regulatory framework to be better clarified for plan users.</p> <p>Support insertion of reference to stock drinking points in (a).</p> <p>Support suggestions to simplify clause (d).</p> | Allow relief in part |
| Federated Farmers | 352 | Support in part | R98, Livestock Access to the Beds of Surface Water Bodies, page 103 | Appropriate to apply more graduation in the activity status of different activities, particularly where there is low intensity access by livestock. | Allow relief in part |
| Federated Farmers | 352 | Support in part | R105, Planting and pest control in natural wetlands, significant natural wetlands and outstanding natural wetlands, page 106 | Insertion of 'significant' or 'significant wetlands' as proposed provides greater certainty over the application of the policy given the wide and varied interpretations that 'natural wetlands' could have. | Allow relief in part |
| Federated Farmers | 352 | Support | R106, Restoration of Natural Wetlands, Significant Natural Wetlands and Outstanding Natural Wetlands, page 107 | Important for there to be consistency with the Regional Policy Statement. | Allow relief |
| Federated Farmers | 352 | Support | R107, Activities in Natural Wetlands and Significant Natural Wetlands, page 107 | Appropriate to apply more graduation in the activity status of different activities, particularly where there is a restoration management plan. | Allow relief |

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| Federated Farmers | 352 | Support | R121 Maintenance of drains, page 114 | The rule needs greater clarity, workability and to be more practicable. | Allow relief |
| Federated Farmers | 352 | Support | R122 Removing vegetation, pages 115-116 | The rule needs greater clarity, workability and to be more practicable. | Allow relief |
| Allan Smith | 35 | Support | 2.2 Definitions, Break-feeding | Insertion of 'or other temporary' recognises the nature of the activity and potential methods that may be employed to give effect break feeding. | Allow relief |
| Allan Smith | 35 | Support | 2.2 Definitions, Erosion Prone Land | Submitter's amendments to definition of Erosion Prone Land (especially as it relates to the western side of the region). | Allow relief |
| Allan Smith | 35 | Support | 2.2 Definitions, Gully | Submitter notes the broadness of the definition of 'gully' and seeks greater particularity in the definition or have it deleted. Broadness of definition makes it unworkable because it captures extensive areas with likely unintended consequences. | Allow relief |
| Allan Smith | 35 | Support in part | 3 Objectives O27 | Submitter notes the broadness of the objective and that it may not always be appropriate in all circumstances. Support the intention of this point, except propose that the word 'protect' be replaced with 'maintain or enhance'. | Allow relief in part, excluding the use of word 'protect' |
| Allan Smith | 35 | Support | 3 Objectives O33, O35 | Submitter indicates that more balancing is required and therefore suggests the words 'where this is practicable' be inserted. | Allow relief |
| Allan Smith | 35 | Support in part | 4 Policies, P3 Precautionary Approach | Submitter indicates that more balancing is required and therefore suggests amendments to the | Allow relief in part |

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| | | | | policy. Support the point that the policy requires further refinement to ensure appropriate balancing is provided for to accommodate situations where there is limited information. | |
| Allan Smith | 35 | Support in part | 4 Policies, P7 Uses of Land and Water | Submitter indicates that more balancing is required and therefore suggests amendments to the policy. Support the point that the policy requires further refinement to ensure appropriate balancing is able to be carried out. | Allow relief in part |
| Allan Smith | 35 | Support | 4 Policies, P8 Beneficial Activities | Submitter indicates that more balancing is required and suggests amendments to the policy. Support the point that the policy requires further refinement to ensure appropriate balancing is able to be carried out. | Allow relief |
| Allan Smith | 35 | Support in part | 4 Policies, P40 | Submitter indicates that more balancing is required and therefore suggests amendments to the policy. Support the point that the policy requires further refinement to ensure appropriate balancing is able to be carried out. | Allow relief in part |
| Allan Smith | 35 | Support in part | 5.3 Discharges to land, R70 Clean Fill Material | Submitter indicates that the rule is overly restrictive and suggests increasing the permitted volume. Support amendments that enable a more permissive approach. | Allow relief to enable more permissive approach |
| Allan Smith | 35 | Support | 5.3 Discharges to land, R71 Pit Latrine | Submitter indicates that the rule is overly restrictive and suggests increasing its permissive nature. Support the intent of the submission. | Allow relief to enable more permissiveness |

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|---|----------------------------|-----------------|--|--|--|
| Allan Smith | 35 | Support | 5.4 Land Use, R94 Cultivation or tilling of land | Submitter indicates that the rule is overly restrictive and suggests increasing its permissive nature to provide for 'naturally occurring high rainfall events'. Support the intent of the submission. | Allow relief |
| Allan Smith | 35 | Support in part | 5.4 Land Use, R115 Culverts | Submitter indicates that the rule is overly restrictive and suggests increasing its permissive nature. Support the intent of the submission point. | Allow relief to enable more permissive approach |
| Allan Smith | 35 | Support in part | 5.4 Land Use, R120 Minor sand and gravel extraction | Submitter indicates that the rule is overly restrictive and suggests increasing its permissive nature. Support the intent of the submission point. | Allow relief to enable more permissive approach |
| Carter Families | 295 | Support | 3.9.4 (buffer) | <p>Appropriate to enable intent of objectives and policies to be progressed 'over time' or to do so as is 'possible'. For example, the intention of provisions to 'maintain' or 'enhance' certain values. It may not always be feasible to fulfil the intent of provisions imminently. For example if there are constraints on accessibility or technology to do so.</p> <p>Also, important that impacts on natural features are not assumed to be impacting the ability of the feature to operate as a buffer to natural hazards. Support the greater clarity proposed by submitters' amendments.</p> | Allow relief. |
| Carter Families | 295 | Support in part | 3.9.5 | Appropriate to enable intent of objectives and policies to be progressed 'over time' or to do so as is 'possible'. For example, the intention of provisions to 'maintain' or 'enhance' certain values. It may | Allow relief for O9, O23, O28, O29, O30, O35, O38, P38 |

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| | | | | <p>not always be feasible to fulfil the intention of provisions imminently. For example if there are constraints on accessibility or technology it may not be feasible to do so.</p> <p>Also, important that there is certainty over sites to which these provisions apply and that they are identified. This helps to ensure the plan is able to be more easily used by plan users and creates greater certainty over its application. This helps the efficiency and effectiveness of the plan.</p> | |
| Carter Families | 295 | Support | 4.13.2 | Do not support provisions (as pNRP proposes) that prevent existing lots in community water drinking supply protection area from constructing a dwelling with on-site effluent disposal system. | Allow relief |
| Carter Families | 295 | Support in part | 4.13.3 | Submitter proposes practical amendments to utilise best practice to make the provisions more workable and appropriate to address the issue to application of fertiliser. (R82) | Allow relief in part |
| Carter Families | 295 | Support | 4.13.4 | It is critical that a phased approach be taken because the current provisions are not feasible for many individuals and small collectives to achieve. Similar approach for territorial authorities should apply to others. (R83) | Allow relief. |
| Carter Families | 295 | Support | 4.13.5 | It is important to simplify rules to ensure they are effective and efficient including administrative efficiency. Submitter proposes amendments to help ensure the provisions are appropriate including | Allow relief |

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| | | | | providing for set backs from potable water supplies. (R89) | |
| Carter Families | 295 | Support | 4.13.6 | Appropriate to encourage best practice as proposed by submitter, and that not all water bodies require the same treatment, enabling more flexible solutions. (R94,95,96 break-feeding and cultivation). | Allow relief or similar relief to give effect to intent |
| Carter Families | 295 | Support | 4.13.7 | Submitter appropriately identifies different characteristics of farming dry and beef stock and the importance of amending the definition of 'dairy cow' to reflect this, as well as associated provisions relating to these matters. (R97) | Allow relief |
| Carter Families | 295 | Support in part | 4.13.8 | Appropriate to differentiate between effects of different types of 'vegetation clearance' and to exclude 'production forest harvesting' from this definition. (R100) | Allow relief |
| Carter Families | 295 | Support | 4.13.9 | Appropriate to support best practice as proposed by submitter, including use of machinery to facilitate works to manage drain clearance. (R121) | Allow relief |
| Carter Families | 295 | Support | 4.13.10 | Submitter notes that the rule does not address a particular activity. The rule lacks particularity and therefore has significant unintended consequences, impacting its effectiveness and efficiency. (R48) | Allow relief |
| Carter Families | 295 | Support | 4.13.11 | Important to enable farm tracks which are fundamental to support the sustainable management of natural and physical resources and to provide for people's health and safety, as well as economic | Allow relief and intent of new rule |

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| | | | | wellbeing. Support intent of proposed new permitted activity rule. (Earthworks) | |
| Carter Families | 295 | Support | 4.13.12 | Appropriate for rule to take into account the catchment as well as the property size when setting limits on earthworks, so as to enable more flexibility and tailored solutions for larger properties depending on above characteristics. (R99) | Allow relief |
| Carter Families | 295 | Support | 4.13.13 | Amendments to definition of Erosion Prone Land, especially as it relates to the western side of the region. | Allow relief |
| Carter Families | 295 | Support | 4.13.14 | Appropriate to apply more graduation in the activity status of different activities. (R101) | Allow relief |
| Carter Families | 295 | Support in part | 5.3.1 | Support the submitters' proposal on the basis that it is appropriate to wait until the Whaitua and related process has had an opportunity to set proposed limits for water takes on the analysis of evidence before considered by the Whaitua. (nPRP water takes) | Allow relief in part |
| Carter Families | 295 | Support | 6.2.1 | Submitter proposes practical amendments to make the provisions more workable and appropriate to address the issue. (R36) | Allow relief |
| Carter Families | 295 | Support in part | 7.3 | Submission says provisions go beyond section 6 of the RMA in seeking to 'restore' areas. Appropriate to amend provisions to enable any intent to restore to be carried out 'over time' rather than imply immediacy, and also to do so | Allow relief for P40, and for P42(b)(c) |

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| | | | | <p>as is 'possible'.</p> <p>It is unclear what 'fragmented habitats' means in the nPRP given different understandings from different agencies etc, particularly in context of other matters submitted on the rest of the pNRP and the uncertainty associated with the interpretation.</p> <p>Important that the plan is clear to plan users from maps what is being sought. Any buffers should be included in sites identified within planning maps particularly for areas of significance. (P40)</p> | |
| Carter Families | 295 | Support in part | 8.2.1 | <p>Appropriate to facilitate a fair approach to objectives and policies to enable their intent to be progressed 'over time' or to do so as is 'possible' rather than imply immediacy. Intention of provisions, for example, to 'maintain' or 'enhance' certain values. It may not always be feasible to fulfil the intent of provisions imminently. For example if there are constraints on accessibility it may not be feasible to carry out activities.</p> | Allow relief for O9, O11, O23, P3, O47, P35, P38, |
| Carter Families | 295 | Support | 9.3.1 | <p>Appropriate to amend provisions to ensure that objectives and policies relating to outstanding natural landscapes are not treated the same as special amenity landscapes, and to ensure consistency with the RMA.</p> | Allow relief |

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| Carter Families | 295 | Support | 10.4.1 | Appropriate to increase area as it does not provide for the sustainable management of natural resources impeding access within and between properties on the west part of the region. (R114) | Allow relief |
| Carter Families | 295 | Support | 10.4.2 | Appropriate to refer only to a minimum size rather than a maximum size. (R115) | Allow relief |

If you require more space for additional comments, please insert new rows as needed

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File No:

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



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For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Allan A Smith

ORGANISATION (* the organisation that this submission is made on behalf of)

personal further submission

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

150 Terrace Road
R D 1, Reikorangi
Waikanae 5391

PHONE

04 2934118

FAX

EMAIL

smithaa@xtra.co.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

I am an owner of land directly impacted by provisions in the PNRP that have implications for our ability to promote the sustainable management of natural and physical resources and specifically provide for our social, economic and cultural wellbeing, and health and safety while enabling activities that safeguard the life supporting capacity of ecosystems.

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Signature: a a smith

Date: 15 March 2016

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

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| | | | | | |
| Waa Rata 149 Terrace Road RD1 Waikanae 5391 | S152 | support | I support all content unless it contradicts some part my own submission S35 | I believe S152 raises important issues which need to be addressed before the Plan is finalised. | The relief sought in S152 except on those points where my own submission S35 makes requests for relief which are different. |
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FULL NAME

Terry Parminter

ORGANISATION (* the organisation that this submission is made on behalf of)

KapAg Ltd

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

PO Box 354
Paraparaumu, 5352

PHONE

021 902656

FAX

EMAIL

terry.parminter@kapag.nz

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| Federated Farmers of New Zealand | S352 | Support with further amendments | Amend submission on M1 | On page 9 of their submission Federated Farmers make the point that WRC has not made a commitment to work with industry groups to develop and resource “jointly owned” strategies that can be effective at encouraging voluntary behaviour change without the costs (regional and personal) of developing and enforcing rules. I agree because this point was made a number of times through the process of public and stakeholder process and because a strategically designed behaviour change process can be more effective than rules. Reference: http://www.regional.org.au/au/ap/en/2006/refereed/3/2863_parmint_ertg.htm | “Wellington Regional Council will <u>work with industry groups and other agencies to develop, implement and monitor, practice-change strategies a work programme to that support ... including but not limited to the production of: ...”</u> |
| | | Support | Critical Recommendations on pages 3&4 of the submission | The current section 32 reports make it difficult to assess the cumulative impact of the PNRP on primary production. They | A section32 report for Primary Production should be prepared prior to the hearing and made available to all submitters. |

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| | | | | contain gaps, the benefit-cost analyses are incomplete, and there are some errors. | |
| | | Support | New Policy – Land and Water Management Framework | Support this policy as a mechanism for encouraging GWRC to work with TAs and industry groups in the development of strategies for voluntary adoption of practice changes. | |
| | | Support with further amendments | Amendments to Rule 83 | <p>Both GWRC and Federated Farmers appear to support the move towards deferred irrigation of effluent to land and the required investment in effluent storage.</p> <p>I support the proposal by Federated Farmers for separate rules for existing farmers and new farmers.</p> <p>I agree with Federated Farmers that there should be no control over the specific herd size for properties as that has no obvious relationship to the risks of effluent contamination. The relationship between herd size and effluent load is adequately addressed in determining pond size and effluent distribution.</p> <p>I support GWRC requiring controlled consents by all farmers applying effluent to land so that they can monitor progress.</p> | <p>(1) Existing dairy farmers. I agree with Federated Farmers that the capital expenditure will generally be over \$100,000 per farm. Therefore I would encourage GWRC to work with the industry in the establishment of a deferred-interest loan for farmers that can be paid back in years when the dairy payout is over \$6/kgMS. Existing farmers should be required to apply for a controlled consent when their existing consent runs out – if that is greater than 12.5 years from when the plan becomes operative or on resale of their farm, whichever comes sooner.</p> <p>(2) New dairy farmers. These should have effluent management systems designed for deferred irrigation. There are too many consent conditions for practical use. Limit these to:</p> <ul style="list-style-type: none"> • Effluent storage volume and construction determined with Effluent Storage Calculator. • Effluent application rates. • Nutrient loading rates per hectare per year. • Contingency plans for prolonged wet weather, mechanical failure |

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ORGANISATION (* the organisation that this submission is made on behalf of)

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PO Box 354
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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

Fold here

FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Bev Abbott

ORGANISATION (* the organisation that this submission is made on behalf of)

Wellington Botanical Society

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

40 Pembroke Rd
Northland
Wellington 6012

PHONE

04 475 8468

FAX

-

EMAIL

bevabbott@xtra.co.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

The mandate of the Wellington Botanical Society includes advocating for the protection of lands and waters under protected area statutes in their natural state. Other objectives including encouraging the study of botany, particularly the NZ flora, and fostering an appreciation of NZ native places, especially in the field.

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:

Date:

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on Name of person/ group making original submission and postal address. | Original submission number The original submission number can be found on the submitter address list. | Position Whether you support or oppose the submission. | Part(s) of the submission you support or oppose Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Reasons Why you support or oppose each submission point. | Relief sought The part or whole of each submission point you wish to be allowed or disallowed. |
|--|---|--|---|---|---|
| <i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood | <i>e.g.</i> submitter S102 | <i>e.g.</i> Oppose | <i>e.g.</i> Oppose all of submission point S102/41 | <i>e.g.</i> The submission point does not recognise... | <i>e.g.</i> Disallow the parts of S102/41 relating to... |
| Queen Elizabeth II National Trust | S157 | Support | QEII Trust argues that the indigenous biodiversity values of Taupō Swamp warrant 'outstanding' status. | We agree that the indigenous biodiversity values of Taupō swamp justify outstanding status. | Add Taupō Swamp to Schedule A3, the list of wetlands with outstanding biodiversity values |
| | | | Wildlands has conducted a desk-based assessment of the biodiversity values of Taupō Swamp against the nine criteria in Schedule F3 by which outstanding wetlands can be assessed. The Taupō Swamp scored A for four criteria and B for a further four criteria. Wildlands noted that some of the B scores were likely to be at the high end of the range. | We agree with the four "A" assessments (Representative, Threatened Environment Classification, Ecosystem or Habitat, and Seasonal or Core Habitat. We think the "B" rankings for Species and Ecosystems may be underestimates. For example, the threatened plant assessments are based on 1981 field surveys, and there is no information about the diversity of invertebrates groups such as snails. Nor is there any information about the ecological processes operating in the different habitats. | Undertake further assessments including on-site mapping of habitat types and species surveys before accepting Wildlands "B" rankings and justification statements for Species and Ecosystems. We look forward to seeing more detailed information about the indigenous biodiversity values of Taupō Swamp when the draft KNE Plan for the Taupō Valley Wetlands is released for public consultation. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|---|
| | | | <p>QEII Trust points out that Taupō Swamp is the receiving environment for the larger catchment, and notes the potential impacts on Taupō Swamp of developments such as Porirua City Council's Northern Growth Area Structure Plan.</p> <p>QEII Trust points out that stricter rules apply to Outstanding Wetlands than to less significant wetlands.</p> | <p>We are very concerned about the significant damage that could be done to Taupō Swamp's ecological processes and indigenous biodiversity if the Natural Resources Plan does not include strict rules to avoid, remedy or mitigate negative environmental impacts arising from the extensive subdivision anticipated in PCC's Plan. Classifying Taupō Swamp as Outstanding is an efficient way of ensuring stricter rules will apply to the subdivision applications. It would also reduce reliance on the Precautionary Principle P3 given the significant gaps in the information available to applicants, GWRC and PCC about the values of Taupō Swamp.</p> | <p>Add Taupō Swamp to Schedule A3, the list of wetlands with outstanding biodiversity values</p> |
| | | | <p>QEII Trust has not commented on this.</p> | <p>We would be very concerned about any reduction in opportunities for public consultation on resource consent applications for the subdivision.</p> | |
| | | | <p>QEII Trust has not commented on this.</p> | <p>Historic heritage values include its use by early Māori occupying the pā at the mouth of the Taupō Stream, the commercial flax production when attempts by pākehā to drain the swamp failed, and the visit by the Queen to see the work of the Queen Elizabeth II National Trust which was renamed to celebrate her Silver Jubilee.</p> | <p>Add Taupō Swamp to Schedule E5: Historic Heritage Freshwater Sites.</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|-----------------------------------|-----------------|--|----------------|----------------------|
|--|-----------------------------------|-----------------|--|----------------|----------------------|

| | | | | | |
|--|--|--|--|--|--|
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If you require more space for additional comments, please insert new rows as needed

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- *1 I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

* **Name:** Ryan Crawford

Name of Organisation you represent:

***Address:** 3/23 Waring Taylor street, Wellington

***Phone/ Fax** 021904771

EMAIL ADDRESS: ryancnz@gmail.com

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 I do wish to be heard in support of my further submission; and, if so,
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Address for contact : Mitchell's Partnerships Ltd.
PO Box 489 Dunedin, 9054
Email Claire.hunter@mitchellpartnerships.co.nz
CC. greg.thomas@wlg.aero

I oppose submitter 282 in regard to the following points:

WIAL Submission Page 5 Paragraph xi:

Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

Policy 15(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment;

Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library: <https://natlib.govt.nz/records/23046068?search%5Bpath%5D=items&search%5Btext%5D=Lyll+Bay+1938>

“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

It should be pointed out that from case law the precedence is with respect to environmental impacts that they are assessed on, what is there today, not what it used to be like.

For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before the old structure was there, it is the impact on the existing environment.

In this case, it would mean that WIAL cannot argue that because the historic human-induced changes to Lyall Bay resulted in a high-quality surfing break, it does not have to consider it or that it has no value because it's not 'natural'. Furthermore, and most importantly, the reclamation may be manmade (i.e. not natural), however, the break that formed beside it formed naturally due to coastal processes and is an entirely natural feature in response to human intervention (it is comprised of swell, currents, water levels, seabed morphology and wind, as per Schedule 1 of the NZCPS).

Relief Sought:

| | |
|--|--|
| Dismiss Wial's decision sought to | remove Objective 037, |
| Dismiss Wial's decision sought to | revise Schedule K of the PNRP with intent to remove the Corner surf break. |

Dismiss Wial's decision sought to delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and
- (b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

Policy 13 Preservation of natural character

2 (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

I note that other policies in the PNRP that relate to natural features (such as 4.6.5 Natural features and landscapes and special amenity landscapes (b))refer to avoid, remedy, or mitigate.

I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by ~~minimising~~ **avoiding remedying, or mitigating** the adverse effects on:

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Note:

The deletion I seek is indicated by strikethrough, the addition I seek is indicated by bold and underline

SIGNED:

*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

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My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

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Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library: <https://natlib.govt.nz/records/23046068?search%5Bpath%5D=items&search%5Btext%5D=Lyll+Bay+1938>

“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

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For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before the old structure was there, it is the impact on the existing environment.

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| | |
|--|--|
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Dismiss Wial's decision sought to delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

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Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

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2 (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

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I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

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Erin Campbell

From: Stephen <stephano.press@gmail.com>
Sent: Wednesday, 16 March 2016 9:12 p.m.
To: Regional Plan
Subject: Very opposed

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* I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

* Name: stephen press

Name of Organisation you represent:

*Address: 35c Parnell st Lower Hutt 5011

*Phone/ Fax 04 9720157

EMAIL ADDRESS:

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Address for contact : Mitchell's Partnerships Ltd.
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Relief Sought:

Dismiss Wial's decision sought to remove Objective 037,

Dismiss Wial's decision sought to revise Schedule K of the PNRP with intent to remove the Corner surf break.

Dismiss Wial's decision sought to delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

(a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and

(b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

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2 (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwatersprings and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid, remedy or mitigate.

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WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

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SIGNED:stephen press

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Sent from my iPad

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- *¹ I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

* **Name:** Jeremy Clegg

Name of Organisation you represent:

***Address:** 9 Eskdale Road, Papakowhai, Porirua

***Phone/ Fax:** 0212926208

EMAIL ADDRESS: cleggjere1@gmail.com

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WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

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SIGNED: Jeremy Clegg - 17.03.2016

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* **Name:**

Edith Woischin

* **Address:**

18 Tennyson ST, 6011 Wellington

* **Phone/ Fax**

022 680 9708

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- Dismiss Wial's decision sought to** remove Objective 037,
- Dismiss Wial's decision sought to** revise Schedule K of the PNRP with intent to remove the Corner surf break.
- Dismiss Wial's decision sought to** delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

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Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

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Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

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* **Name:**

Alessandro Bonora:

* **Address:**

296 queens drive, Iyall bay, Wellington, new Zealand

* **Phone/ Fax**

0211318364

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Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

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Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

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“I enjoy the sport of surfing, and appreciate the benefits surfing brings to the Wellington Region.”

*** Name: Rory Sullivan**

Name of Organisation you represent:

***Address: 28 Myles Way, Queenstown, 9304**

***Phone/ Fax 0277071143**

EMAIL ADDRESS: Sullivan.rory@gmail.com

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Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

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* **Name:** Christina Roberts

Name of Organisation you represent:

***Address:** 3/3 Severn Street Island Bay Wellington

***Phone/ Fax** 0222364730

EMAIL ADDRESS: christina.roberts91@gmail.com

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Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

DETAILS OF FURTHER SUBMITTER:

- *¹ I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

* **Name:** Mads Naeraa-Spiers

Name of Organisation you represent:

***Address:** 6 Oku Street, Island Bay, Wellington 6023

***Phone/ Fax** 021 58 58 14

EMAIL ADDRESS: naeraa@yahoo.dk

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

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Details of the submission(s) I am commenting on :

1. Submitter 282: Wellington International Airport Limited.

Address for contact : Mitchell's Partnerships Ltd.
PO Box 489 Dunedin, 9054
Email **Claire.hunter@mitchellpartnerships.co.nz**
CC. **greg.thomas@wlg.aero**

I oppose submitter 282 in regard to the following points:

WIAL Submission Page 5 Paragraph xi:

Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

Policy 15(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment;

Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library:

<https://natlib.govt.nz/records/23046068?search%5Bpath%5D=items&search%5Btext%5D=Lyll+Bay+1938>

“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

It should be pointed out that from case law the precedence is with respect to environmental impacts that they are assessed on, what is there today, not what it used to be like.

For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before the old structure was there, it is the impact on the existing environment.

In this case, it would mean that WIAL cannot argue that because the historic human-induced changes to Lyall Bay resulted in a high-quality surfing break, it does not have to consider it or that it has no value because it's not 'natural'. Furthermore, and most importantly, the reclamation may be manmade (i.e. not natural), however, the break that formed beside it formed naturally due to coastal processes and is an entirely natural feature in response to human intervention (it is comprised of swell, currents, water levels, seabed morphology and wind, as per Schedule 1 of the NZCPS).

Relief Sought:

- Dismiss Wial's decision sought to** remove Objective 037,
- Dismiss Wial's decision sought to** revise Schedule K of the PNRP with intent to
remove the Corner surf break.
- Dismiss Wial's decision sought to** delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and
- (b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

Policy 13 Preservation of natural character

- 2 (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight

than avoid remedy or mitigate.

I note that other policies in the PNRP that relate to natural features (such as 4.6.5 Natural features and landscapes and special amenity landscapes (b))refer to avoid, remedy, or mitigate.

I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by ~~minimising~~ **avoiding remedying, or mitigating** the adverse effects on:

(a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and

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Note:

The deletion I seek is indicated by strikethrough, the addition I seek is indicated by bold and underline

SIGNED:

*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

Please note:

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Further Submission on The Greater Wellington Natural Resources Plan Review.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (PNRP).

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www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

By email: regionalplan@gw.govt.nz

Or Post:

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Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
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Wellington 6142

DETAILS OF FURTHER SUBMITTER:

- *¹ I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

the grounds for saying that I am within the category I have ticked:

“I enjoy the sport of surfing, and appreciate the benefits surfing brings to the Wellington Region.”

*** Name: Stan Andis**

Name of Organisation you represent:

***Address: 36 Ahuriri Street, Strathmore Park, Wellington 6022**

***Phone/ Fax 970 4750**

EMAIL ADDRESS: sandis@paradise.net.nz

¹ * red indicates details that must be filled in, make your choice by checking which red box(applies to you). You can simply accept the reason; “I enjoy the sport of surfing and appreciate the benefits surfing brings to the Wellington Region” or replace that with something else. Also, please make your choice for the 3 red boxes on page 2

- I do not wish to be heard in support of my further submission; or
- I do wish to be heard in support of my further submission; and, if so,
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Address for contact : Mitchell's Partnerships Ltd.
PO Box 489 Dunedin, 9054

Email **Claire.hunter@mitchellpartnerships.co.nz**

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I oppose submitter 282 in regard to the following points:

WIAL Submission Page 5 Paragraph xi:

Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy

13(2)(c) and;

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Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library:
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It should be pointed out that from case law the precedence is with respect to environmental impacts that they are assessed on, what is there today, not what it used to be like.

For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before

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Dismiss Wial's decision sought to remove Objective 037,

Dismiss Wial's decision sought to revise Schedule K of the PNRP with intent to remove the Corner surf break.

Dismiss Wial's decision sought to delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

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Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

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Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

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PLEASE CC THIS EMAIL TO WIAL, AN OBLIGATION OF THE FURTHER SUBMISSION
PROCESS:

Claire.hunter@mitchellpartnerships.co.nz

or by Post:

Wellington International Airport Ltd

c/o Mitchell Partnerships Ltd

P.O. Box 489

Dunedin 9054

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- *¹ I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

* **Name:** Peter Weber

Name of Organisation you represent:

* **Address:** PO Box 4548, Palmerston North

* **Phone/ Fax** 06 3239550

EMAIL ADDRESS: peterweber@orcon.net.nz

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I note that other policies in the PNRP that relate to natural features (such as 4.6.5 Natural features and landscapes and special amenity landscapes (b))refer to avoid, remedy, or mitigate.

I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by ~~minimising~~ **avoiding remedying, or mitigating** the adverse effects on:

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PLEASE CC THIS EMAIL TO WIAL, AN OBLIGATION OF THE FURTHER SUBMISSION PROCESS:

Claire.hunter@mitchellpartnerships.co.nz

or by Post:

Wellington International Airport Ltd
c/o Mitchell Partnerships Ltd
P.O. Box 489
Dunedin 9054

FURTHER SUBMISSION ON BEHALF OF KAPITI COAST AIRPORT HOLDINGS LIMITED

To: Greater Wellington Regional Council
Further submission on Proposed Natural Resources Plan for the Wellington Region
P O Box 11646
Manners St
Wellington
Email: regionalplan@gw.govt.nz

1. **Kapiti Coast Airport Holdings Limited (KCAHL)** is a submitter and seeks to make further submissions on the Proposed Natural Resources Plan for the Wellington Region 2015 (Proposed Plan).
2. KCAHL is a significant landholder and owner of Kapiti Coast Airport and as such represents a relevant aspect of the public interest.
3. The submissions on which further submissions are made by KCAHL have a direct effect on the interests and operational capabilities of KCAHL.
4. KCAHL has an interest in the Proposed Plan that is greater than the public generally.
5. KCAHL makes the further submissions as set out in the **attached** table.
6. KCAHL wishes to speak at the hearing in support of its further submission.

DATE: 22 March 2016

Kapiti Coast Airport Holdings Limited

Address for Service

c/- Brigid Kelly
Todd Property
P O Box 106 249
Auckland
Phone: 09 306 8676
Email: brigid.kelly@toddproperty.co.nz

| Original submitter | Original submission number | KCAHL's position | Parts of submission supported or opposed | Reasons | Relief sought |
|---|----------------------------|------------------|--|---|-----------------------|
| Wellington International Airport Limited c/- Mitchell's Partnerships Ltd, PO Box 489 Dunedin, 9054 New Zealand | S282/005 | Support | <p>3. Objectives:</p> <p>New Objective O# (amend numbering as necessary) - Development of regionally significant infrastructure - Provide for and enable the development and growth of regionally significant infrastructure.</p> | KCAHL supports the need to specifically recognise the enablement and growth of regionally significant infrastructure. | Accept new objective. |
| NZ Transport Agency Attn: Caroline Horrox, PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146/064 | Support | <p>3. Objectives</p> <p>Add new objective: <u>Discharges associated with regionally significant infrastructure are managed through the adoption of the best practicable option.</u></p> | KCAHL supports the need to specifically provide for ancillary activities associated with regionally significant infrastructure, including discharge consents. | Accept new objective. |
| Wellington International Airport Limited c/- Mitchell's Partnerships Ltd, PO Box 489 Dunedin, 9054 New Zealand | S282/013 | Support | <p>Objective O21:High hazard areas</p> <p>Amend Objective O21 as follows:</p> <p>Inappropriate use and development in high hazard areas is avoided, <u>and where avoidance is impracticable or for reasons of functional need or operational requirements, the effects of use and development in high hazard areas should be remedied or mitigated.</u></p> | <p>The definition of high hazard area is <i>"for the purposes of the Plan, all areas in the coastal marine area and the beds of lakes and rivers are high hazard areas."</i></p> <p>This definition is broad and the objective proposes that areas are "avoided". This may not be practicable in all cases, particularly where there is a functional or operational need for an activity to</p> | Amend objective. |

| Original submitter | Original submission number | KCAHL's position | Parts of submission supported or opposed | Reasons | Relief sought |
|---|----------------------------|------------------|---|--|---|
| | | | | locate in that area. | |
| Wellington International Airport Limited c/- Mitchell's Partnerships Ltd, PO Box 489 Dunedin, 9054 New Zealand | S282/020 | Support | Objective O47: Sediment runoff Delete O47 | The objective requires that: "The amount of sediment-laden runoff entering water is reduced." The wording of this objective is inappropriate and should be amended or deleted. | Delete or amend objective. |
| Wellington City Council Attn: Alison Newbald, PO Box 2199 Wellington, 6140 New Zealand | S286/006 | Support | 4. Policies Remove the use of 'avoid' in the policies. | KCAHL supports the need to carefully review and amend proposed policies that require avoidance of effects. In many cases, effects can be appropriately mitigated or remedied. Objectives seeking to avoid effects should also be considered carefully. | Review objectives and policies to ensure total avoidance effects of effects is only required in limited circumstances and where warranted. Amend objectives and policies to appropriately recognise that mitigation or remediation of effects can be appropriate. |
| Wellington International Airport Limited c/- Mitchell's Partnerships Ltd, PO Box 489 Dunedin, 9054 New Zealand | S282/037 | Support | Policy P31: Aquatic ecosystem health and mahinga kai Amend Policy P31 as follows: Aquatic ecosystem health and mahinga kai shall be maintained <u>and, where appropriate,</u> or restored by managing the effects of use and development on physical, chemical and biological processes to: a) minimise <u>avoid, remedy or mitigate</u> adverse effects on natural flow characteristics and hydrodynamic | The amendments proposed better reflect the requirements and language of the RMA. | Accept amendments or words to like effect. |

| Original submitter | Original submission number | KCAHL's position | Parts of submission supported or opposed | Reasons | Relief sought |
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| | | | <p>processes, and the natural pattern and range of water level fluctuations in rivers, lakes and natural wetlands, and</p> <p>b) minimise <u>avoid, remedy or mitigate</u> adverse effects on aquatic habitat diversity and quality, including the form, frequency and pattern of pools, runs, and riffles in rivers, and the natural form of rivers, lakes, natural wetlands and coastal habitats, and</p> <p>c) minimise <u>avoid, remedy or mitigate</u> adverse effects on habitats that are important to the life cycle and survival of aquatic species, and</p> <p>d) <u>avoid, remedy or mitigate</u> adverse effects at times which will most affect the breeding, spawning, and dispersal or migration of aquatic species, and</p> <p>e) avoid creating barriers to the migration or movement of indigenous aquatic species, and restore the connections between fragmented aquatic habitats where appropriate, and</p> <p>f) minimise <u>avoid, remedy or mitigate</u> adverse effects on riparian habitats and restore them where practicable, and</p> <p>g) avoid the introduction, and restrict the spread, of aquatic pest plants and animals.</p> | | |
| <p>NZ Transport Agency</p> <p>Attn: Caroline Horrox, PO Box</p> | <p>S146/147</p> | <p>Support</p> | <p>Rules 5.2.3 Stormwater</p> <p>Add a new rule:</p> <p><u>Existing permitted or otherwise lawfully established discharges of stormwater into water or onto or into land</u></p> | <p>The proposed rule would provide appropriate recognition of regionally significant infrastructure.</p> | <p>Accept new rule.</p> |

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| 5084 Lambton Quay Wellington, 6145 New Zealand | | | <u>where it may enter water from a port, airport, railway or state highway existing at the date of notification of the Proposed Natural Resources Plan is a permitted activity.</u> | | |
| NZ Transport Agency Attn: Caroline Horrox, PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146/122 | Support | Policy P97: Managing sediment discharges Amend Policy 97: The discharge of sediment to surface water bodies and coastal water from earthworks activities shall be minimised <u>avoided, remedied or mitigated to the extent practicable</u> by using a source control approach. Good management practices shall be used in site erosion and sediment control design operation and maintenance in order to minimise the adverse effects of sediment-laden stormwater discharges. Effects that cannot be minimised may be appropriately offset. | The amendments proposed better reflect the requirements and language of the RMA. | Accept amendments or words to like effect. |

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Relief Sought:

- Dismiss Wial's decision sought to** remove Objective 037,
- Dismiss Wial's decision sought to** revise Schedule K of the PNRP with intent to remove the Corner surf break.
- Dismiss Wial's decision sought to** delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and
- (b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

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Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

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Ruby Cumming

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DETAILS OF FURTHER SUBMITTER:

*¹ I am a person representing a relevant aspect of the public interest

* **Name:** Nikita 雅涵 Tu-Bryant

Name of Organisation you represent:

***Address:** 27 Milton Street

Berhampore

Wellington 6023

NZ

***Phone/ Fax**

0274722440

EMAIL ADDRESS: nikita.2b@gmail.com

I do not wish to be heard in support of my further submission; or

I do wish to be heard in support of my further submission; and, if so,

Details of the submission(s) I am commenting on :

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Address for contact : Mitchell's Partnerships Ltd.
PO Box 489 Dunedin, 9054
Email Claire.hunter@mitchellpartnerships.co.nz
CC. greg.thomas@wlg.aero

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Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

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Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

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Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library:

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Objective 037

**Significant surf breaks are protected from inappropriate use and development
I support the inclusion of this objective in the PNRP.**

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and
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Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

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Decision Sought: Change Policy P51 to read as:

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“I enjoy the sport of surfing, and appreciate the benefits surfing brings to the Wellington Region.”

*** Name: Dave Gilbert**

Name of Organisation you represent:

***Address: 69 Apu Crescent, Lyall Bay, 6022**

***Phone/ Fax +64223171426**

EMAIL ADDRESS: dave.r.gilbert@gmail.com

¹ * red indicates details that must be filled in, make your choice by checking which red box(applies to you). You can simply accept the reason; “I enjoy the sport of surfing and appreciate the benefits surfing brings to the Wellington Region” or replace that with something else. Also, please make your choice for the 3 red boxes on page 2

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I oppose submitter 282 in regard to the following points:

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WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

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Reason

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Dismiss Wial's decision sought to remove Objective 037,

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Dismiss Wial's decision sought to delete P51 of the PNRP

Objective 037

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I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

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*** Name: Dickon Lentell**

Name of Organisation you represent:

***Address: 10 Maybury Way, Island Bay – Wellington.**

***Phone/ Fax 021 464 032**

EMAIL ADDRESS: dickon@wakefields.co.nz

¹ * red indicates details that must be filled in, make your choice by checking which red box(applies to you). You can simply accept the reason; “I enjoy the sport of surfing and appreciate the benefits surfing brings to the Wellington Region” or replace that with something else. Also, please make your choice for the 3 red boxes on page 2

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I support the inclusion of this objective in the PNRP.

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Submitter ID:

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Further Submission

on Proposed Natural Resources Plan for the Wellington Region



Fold here

Clause 8 of Schedule 1, Resource Management Act 1991.

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FreePost Authority Number 3156



FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

G.W. de Lisle

ORGANISATION (* the organisation that this submission is made on behalf of)

Birds New Zealand (Ornithological Society of New Zealand)

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

244 Blue Mountains Road,
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Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

I am the Wellington Regional Representative for Birds New Zealand. The aims of Birds New Zealand are listed in our website, <http://www.osnz.org.nz/aims.htm>. Birds New Zealand is devoted to all aspects of ornithology.

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:

Date:

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

G.W. de Lisle
Wellington Regional Representative,
Birds New Zealand (OSNZ)
244 Blue Mountains Road
RD1
Upper Hutt, 5371
23/2/2016

osnzwelly@gmail.com

Details of the submission you are commenting on.

Queen Elizabeth II National Trust, *Ngā Kairauhī Papa*
PO Box 3341
Level 4, 138 The Terrace
Wellington 6140

Original Submission number, S157

Position, Support

Parts of the Submission you support

Support the submission of the QE11 National Trust to the Greater Wellington Regional Council's Natural Resource plan to elevate the status of Taupō swamp from "Significant Wetland" to "Outstanding Wetland".

Reasons

Taupō Swamp is a relatively large (30 ha) representative example of a topogenous lowland freshwater mire, a wetland type characteristic of lowland New Zealand. The swamp is one of only a few lowland topogenous mires in the Wellington Region that have retained a largely indigenous vegetation cover. Taupō Swamp was formed by uplifting of the seabed during an earthquake, which is an unusual way for wetlands to form. This type of habitat is the favoured site for a group of wetland birds which are increasingly becoming scarce in New Zealand. They include bittern, fernbird, spotless crane and marsh crane.

In the latest review of the conservation status of New Zealand birds, Robertson et al., (2012) classified these birds as follows

Australian bittern – Nationally endangered – A (1/1)

Fernbird – Declining

Spotless crane – Relict – A*

Marsh crane – Relict – A*

*Have undergone a documented decline within the last 1000 years, and now occupy <10% of their former range. 5000-20,000 individuals, population stable.

The above classifications were established on a national rather than regional basis. Recently, Greater Wellington Regional Council (GWRC) and the Department of Conservation ran an exercise

and applied DOC's national threat classification system criteria to Wellington region bird populations (N. McArthur pers communication). A key result of this exercise was that a number of birds were more highly threatened within the Wellington region than they are nationally. Importantly, spotless crake was one of those species that was assigned as *Regionally Critical* (the highest possible threat ranking), whereas at a national scale they are ranked as *At Risk, Relict*. A regionally critical threat ranking is one where the regional population is small (est. <200 birds for spotless crake) and very sparse and localised distribution. The change in threat status most likely reflects the major loss of suitable habitat in the Wellington region.

A targeted survey of Taupo Swamp was carried out by Delia Small in September / October, 2015 to determine the presence or absence of the wetland species, bittern, fernbird, spotless crake and marsh crake. Spotless crake were observed through their calls on three different occasions. No evidence was found for the presence of bittern, fernbird or marsh crake. Given the difficulties of gaining access to some areas of Taupo Swamp to adequately survey the area and the cryptic nature of these birds one cannot be certain of their absence. Furthermore, some of these species such as bittern may only be present at Taupo Swamp at certain times of the year. Historical records have identified bittern at the Taupo Swamp (Parish, 1984). The recent improvements in the ecology of Taupo Swamp, including some predator control, make it increasingly likely they will be observed in this wetland. The recent bird survey by Delia Small highlighted the need for further bird monitoring of the Taupo Swamp, especially considering the cryptic nature of the wetland birds.

The importance of the above information on birds of the Taupo swamp response relates to criterion 4, Under Rarity, Indigenous Fauna and Flora, used by GWRC in schedule 3, Criteria for identifying natural wetlands with significant indigenous biodiversity values. Under this system, Taupo Swamp rates a B for criterion 4 just on the basis of the birds known to have occurred in this wetland. Further investigations of the Taupo Swamp are likely to confirm its importance for wetlands birds, especially those which are either classified as Nationally or Regionally Critical.

The information of birds recorded in the Taupo Swamp are supportive of the submission of the QE11 Trust to have its status elevated from "Significant Wetland" to "Outstanding Wetland".

References

Parrish G. 1984: Wildlife and wildlife sites of the Wellington Region. *Fauna Survey Unit Report No. 38*. New Zealand Wildlife Service, Wellington.

Robertson HA et al., (2012) Conservation status of New Zealand Birds, 2012. New Zealand threat classification series 4, Department of Conservation, ISSN 2324–1713 (web PDF)

Submitter ID:

File No:



greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

Further Submission

on Proposed Natural Resources Plan
for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

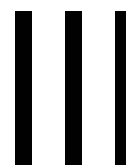
Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



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Further Submission on Proposed Natural Resources Plan for the Wellington Region
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Wellington 6142

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- I do wish to be heard in support of my further submission; and, if so,
- I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | Transpower position | Reasons | Relief sought |
|---|----------------------|--|---------------------|--|-----------------|
| 1. Introduction | | | | | |
| Vector Gas Ltd | S145/002 | Provide a mechanism for industry representation, including infrastructure providers, to be involved in the whitua committees. | Support | Given the importance and role of the whitua committees, the ability for infrastructure providers to be included in the process is supported. | Allow the point |
| 2. Interpretation | | | | | |
| Vector Gas Ltd | S145/003 | Retain the approach of including suites of ss9, 12 - 15 activities under a single rule. | Support | The rule framework is supported as it assists in plan interpretation and clarifies the activities covered in the specific rule. | Allow the point |
| NZ Transport Agency | S146/027 | Amend the definition of operational requirement : <i>When an activity needs to be carried out in a particular location or way in order to be able to function <u>safely</u>, effectively and efficiently.</i> | Support | The inclusion of “safely” within the definition of operational requirement is supported as the requirement to operate safely is a key requirement of most regionally significant infrastructure. | Allow the point |
| Wellington Electricity Lines Limited | S126/006 | Amend the definition for Regionally Significant Infrastructure to read: ... · <i>the national electricity grid</i> · <i>facilities for the generation, transmission and distribution of electricity.</i> · <i>a network (as defined in the Electricity Industry Act 2010) ...</i> | Neutral | On the basis that the National Grid is explicitly identified as regionally significant infrastructure, the amendment sought by Wellington Electricity Lines Limited is not opposed. | Neutral |
| Powerco | S290/060 | Modify definition of Regionally Significant Infrastructure as follows: <i>Regionally significant infrastructure includes... • facilities for the generation and transmission of electricity where it is supplied to the electricity distribution network, including the national grid. • Facilities for the generation and/or transmission of electricity where it is supplied to the national electricity grid and/or the local distribution network. This includes supply within the local electricity distribution network...</i> | Neutral | On the basis that the National Grid is explicitly identified as regionally significant infrastructure, the amendment sought by Powerco is not opposed. | Neutral |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | Transpower position | Reasons | Relief sought |
|---|----------------------|--|---------------------|---|-----------------|
| NZ Transport Agency | S146/031 | Amend the definition of reverse sensitivity : <i>The vulnerability of an existing lawfully-established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activities, thereby creating the potential for the operation, <u>maintenance, upgrade and development</u> of such existing activity to be constrained.</i> | Support | Expansion of the definition is supported as it recognises it is not only the operation of existing activities which can be constrained, but also associated maintenance, upgrade and development. As the definition is used within <i>Policy P14: Incompatible activities adjacent to regionally significant infrastructure and renewable electricity generation activities</i> , the amendment is compatible with the wording within the Policy. | Allow the point |
| Wellington Electricity Lines Limited | S126/010 | Amend the definition of 'vegetation clearance' to exclude trimming and maintenance activities associated with electricity supply networks, as follows: <i>"The clearance or destruction of woody vegetation (exotic or native) by mechanical or chemical means, including felling vegetation, spraying of vegetation by hand or aerial means, hand clearance, and the burning of vegetation. <u>Vegetation clearance for maintaining and operating safe electricity supply networks is exempt from the definition of vegetation clearance.</u>"</i> | Support | The exemption sought is supported as it recognises the need for vegetation clearance to ensure the safe the efficient operation of lines and substations, as well as being consistent with the Electricity (Hazards from Trees) Regulations 2003. | Allow the point |
| 3. Objectives | | | | | |
| NZ Transport Agency | S146/043 | Add new Objective : <i><u>To recognise that regionally significant infrastructure represents appropriate use and development in all environments where there are functional needs or operational requirements</u></i> | Support | The submission point appropriately recognises the functional needs and operational requirements regarding regionally significant infrastructure. In the context of the National Grid, such an objective also gives effect to Policy 3 of the National Policy Statement for Electricity Transmission 2008 ("NPSET"). | Allow the point |
| NZ Transport Agency | S146/042 | Add new objective : <i><u>The safe, effective and efficient use, operation, maintenance, upgrade and development of regionally significant infrastructure is provided for</u></i> | Support | The submission point appropriately provides for an enabling objective regarding regionally significant infrastructure. In the context of the National Grid, such an objective also gives effect to Policy 2 of the NPSET. | Allow the point |
| Spark New Zealand Trading Limited | S98/005 | Amend Obj 12 : <i>The social, economic, cultural, and environmental <u>and health and safety</u> benefits of regionally significant infrastructure and renewable electricity generation activities are recognised. <u>Obj 12A Recognise that some existing and future regionally significant infrastructure has a functional need and/or operational requirement to be located and/or operated in a particular environment.</u></i> | Support | This submission point appropriately recognises the health and safety benefits of regionally significant infrastructure. In the context of the National Grid, proposed new objective 12A also gives effect to Policy 3 of the NPSET | Allow the point |
| Masterton District Council | S367/040 | Retain Objective O12 with the addition of the words <i><u>"and provided for"</u></i> following the existing text. | Support | The relief sought is consistent with that sought by Transpower and would give effect to Policy 1 of the NPSET which contains a requirement to "recognise and provide for". | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | Transpower position | Reasons | Relief sought |
|---|----------------------|--|---------------------|---|-----------------|
| Meridian Energy Limited | S82/009 | Amend Objective O13 in the following manner (or similar wording): <i>The use and ongoing operation of regionally significant infrastructure and renewable energy generation activities in the coastal marine area are protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.</i> | Support | The point is supported as the removal of wording relating to the coastal marine area reflects the relief sought in Transpower's submission, particularly that reverse sensitivity issues relate to the whole region not just the coastal marine area. Deletion of the word "new" is supported as it recognizes that reverse sensitivity effects on regionally significant infrastructure can result from existing activities subject to change as well as new activities. | Allow the point |
| Chorus New Zealand Limited | S144/007 | Amend Objective O21 as follows: <i>Inappropriate use and development in high hazard areas is avoided, <u>other than (a) where it has a functional need and/or operational requirement to be located there, and/or (b) where it is necessary to enable the efficient operation of regionally significant infrastructure.</u></i> | Support | As noted by the submitter, given the emphasis on 'avoid' within the objective, the suggested amendment would assist in determining whether proposed use and development is "inappropriate". Such an amendment would assist with plan interpretation and application of the objective. | Allow the point |
| NZ Transport Agency | S146/054 | Amend Objective O31 : <i>Outstanding water bodies and their significant values are protected <u>from inappropriate use and development.</u></i> | Support | In addition to the reasoning provided in the submission, such an amendment would be consistent with Section 6 of the RMA, and clarify that it is not all and any development and use with outstanding water bodies that the waterbodies are to be protected from, but rather the focus is on the inappropriate activities. | Allow the point |
| CentrePort Limited | S121/031 | Amend Objective O33 as follows: <i>Sites with significant mana whenua values are protected <u>from inappropriate use and development</u> and restored <u>where values have been compromised.</u></i> | Support | The change in emphasis afforded by the amendments sought are supported as it appropriately provides some context as to what sites are to be protected from, and when restoration is required. | Allow the point |
| 4. Policies | | | | | |
| Powerco | S29/014 | Modify Policy 4 as follows: <i>Where minimisation of adverse effects is required by policies in the Plan, minimisation means reducing adverse effects of the activity to the smallest amount practicable and shall <u>may</u> include: (a) consideration of alternative <u>practicable</u> locations and methods for undertaking the activity that would have less adverse effects, and including where relevant, a location outside of the (b) locating the activity away from areas identified...</i> | Support | The amendments sought are supported as they help to rationalise the policy. | Allow the point |

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|---|----------------------|--|---------------------|--|-------------------------------|
| Masterton District Council | S367/067 | Amend Policy P4 Amend criteria (a) and insert the following as a new criteria (b), and renumbering as appropriate: " <i>(a) consideration of <u>the effects and benefits arising from using alternative locations and methods for undertaking the activity (including the costs and benefits) that would have less adverse effects, and (b) consideration of the effects of the functional or operational needs of Regionally Significant Infrastructure, and the means by which any identified adverse effects can be practicably avoided, remedied, or mitigated, and;</u></i> | Support | The amendment sought to 4a) is supported as it provides for the wider consideration of alternative locations. The provision of new policy 4b) is supported as it appropriately recognises the needs and effects of regionally significant infrastructure. Both amendments better inform the policy and will assist in plan interpretation and application. | Allow the point |
| Wellington City Council | S286/001 | Include a new policy (or similar) in Section 4.2 Beneficial use and development: <i>Recognise the contribution existing urban areas, identified urban growth areas and infrastructure make to the social, economic and cultural wellbeing of people and communities and provide for their ongoing use and development.</i> | Support | Recognition of the contribution infrastructure makes to social, economic and cultural wellbeing is supported as it highlights the importance of this type of use and development. | Allow the point |
| Federated Farmers of New Zealand | S352/129 | NEW Policy] <i>Reverse sensitivity - Primary production activities shall be protected from new incompatible use and development occurring under, over or adjacent to it, by the location and design of any new use and development to avoid, remedy or mitigate any reverse sensitivity effects.</i> | Oppose | The point is opposed as the matter is primarily related to land use and more appropriately addressed at the district plan level. | Disallow the submission point |
| Kiwi Rail Holdings Limited | S140/030 | Amend Policy P7 to add: <i>(f) regionally significant infrastructure.</i> | Support | Given the importance and benefits of regionally significant infrastructure (as recognised in Obj 12) the amendment to Policy P7 is supported. | Allow the point |
| Vector Gas Ltd | S145/028 | Amend Policy 12: <i>The benefits of regionally significant infrastructure and renewable energy generation activities are recognised and provided for by having regard to taking into account:</i> <i>(a) . . .</i> <i>(b) the investment in, and the location of existing infrastructure and structures, and (c)</i> <i>(d) the functional need for port activities and other regionally significant infrastructure to be located within the coastal marine area and the coastal area, and (e) the functional need for regionally significant infrastructure to be located over, under, within and adjacent the beds of rivers and lakes, and</i> <i>(f).....</i> | Support | For the reasons outlined in the submission, the amendment sought by Vector Gas Ltd is supported. Specific to the National Grid, recognition of the technical and operational requirements proposed within this amendment is consistent with Policy 3 of the NPSET. | Allow the point |
| NZ Transport Agency | S146/083 | Amend Policy 13: <i>The use, operation, maintenance, and upgrade and development of existing regionally significant infrastructure and renewable energy generation activities are beneficial and generally appropriate. Or Retain Policy 13 (i.e. excluding 'development') and add a new policy to enable new development: <u>The development of new regionally significant infrastructure and renewable energy generation activities to meet the needs of the community are beneficial and are generally appropriate.</u></i> | Support | The amendment/addition of a new policy relating to development of regionally significant infrastructure is supported as it appropriately recognises that development of infrastructure will continue to occur and is required given the essential nature of regionally significant infrastructure. | Allow the point |

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| NZ Transport Agency | S146/090 | Amend Policy 25 : <i>Use and development shall avoid, <u>remedy or mitigate significant</u> adverse effects on natural character in the coastal marine area (including high natural character in the coastal marine area) and in the beds of lakes and rivers, and avoid, remedy or mitigate other adverse effects of activities, taking into account: (d) whether it is practicable to protect natural character from inappropriate use and development through the use and development is appropriate after <u>considering: (i) using on the use of alternative locations,</u> or form of development that would be more appropriate to that location; and (ii) considering the extent to which functional need or existing use limits location and development options; (iii) <u>whether the use or development is regionally significant infrastructure.</u></i> | Support | The amendments to the policy are supported as they recognise the reality that some use and development (particularly in relation to regionally significant infrastructure) can be appropriate based on consideration of the relevant matters set out in the policy. | Allow the point |
| Spark New Zealand Trading Limited | S98/019 | Amend Policy 132 : <i>Use and development in the coastal marine area shall.. <u>(h) recognise the location, operation and function of existing regionally significant infrastructure.</u></i> | Support | The addition to the policy is supported as there are circumstances where co-location is not practical. An example of this is the Cook Strait cable, where a concentration of infrastructure would be inappropriate given the nature and importance of the National Grid cables. | Allow the point |
| 5.2 Rules – Discharges to Water | | | | | |
| Wellington Water Limited | S135/138 | Rule R42: Minor discharges - permitted activity. Provide a special category of permitted activity for regionally significant infrastructure, or have consents trigger to controlled activity status. | Support | The provision of a rule is supported in principle as it recognises the importance and role of regionally significant infrastructure. | Allow the point |
| Best Farm Limited, Hunters Hill Limited and Stebbings Farmlands Limited | S149/015 | Amend Rule R48(b) to only exclude stormwater discharges from contaminated land where the discharge is from an area(s) of that land that is known to be contaminated. | Support | The submission point is supported as it aligns with the submission point of Transpower seeking an amendment to the definition of Contaminated Land to confirm that it only relates to land confirmed as contaminated (i.e. Category III land). | Allow the point |
| Kapiti Coast Airport Holdings Limited | S99/025 | Amend Rule R48 : <i>Stormwater from an individual property - permitted activity. The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, from an individual property <u>(including any property that contains regionally significant infrastructure)</u> is a permitted activity, provided the following conditions are met: . . .'</i> | Support | The submission point is supported as it clarifies that the rule also applies to a site containing regionally significant infrastructure. | Allow the point |
| 5.3 Rules – Discharges to Land | | | | | |
| NZ Transport Agency | S146/154 | Amend Rule R67 : <i>The discharge of water or contaminants into water, or onto or into land where it may enter water: (a) inside a site or habitat identified in ... and (b) that is not permitted by Rules R42, R43, R44 or R45; and (c) that is not a discharge associated with a <u>regionally significant infrastructure</u></i> Or Introduce a new discretionary rule specific to discharges of water or contaminants into water, or onto or into land where it may enter water from regionally significant infrastructure inside sites of significance. | Support | Transpower supports the introduction of a discretionary activity rule providing for discharges from regionally significant infrastructure inside sites of significance, as such a rule recognises the importance and benefit of regionally significant infrastructure, and reflects the policy framework relating to regionally significant infrastructure. | Allow the point |

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| 5.5 Rules – Wetlands and Beds of Lakes and Rivers | | | | | |
| NZ Transport Agency | S146/163 | 5.5.3 Activities in wetlands. Add a new rule for existing structures in all wetlands. <u>Existing permitted or otherwise lawfully established structures in any wetland existing at the date of notification of the Proposed Natural Resource Plan, and the use of those structures, is a permitted activity.</u> | Support | The rule is supported as it recognises existing lawfully established activities. | Allow the point |
| NZ Transport Agency | S146/162 | 5.5.2 Wetlands general conditions Amend general conditions:... (d) once operational, new structures are designed and installed and maintained, and activities are carried out in a manner to ensure that fish passage is maintained at all times, and (e) during construction or maintenance works, fish passage shall not be restricted for a duration longer than necessary to undertake the activity and must not be restricted for a period longer than 12 hours in any 72 hour period; and... | Support | For the reasons outlined in the NZ Transport Agency submission, the amendments relating to fish passage are supported. | Allow the point |
| NZ Transport Agency | S146/164 | Amend Rule R104 : is a permitted activity, provided the following conditions are met: (f) only hand-held machinery is used in any area of the natural wetland <u>unless water has been temporarily diverted from the working area, and...</u> | Support | The amendment sought is supported as it helps to clarify the circumstances for use of non-hand held machinery. | Allow the point |
| Wellington Electricity Lines Limited | S126/027 | Amend Rule R104 : Structures in natural wetlands and significant natural wetlands - permitted activity Add a new rule to account for maintenance, repair, addition or replacement of existing regionally significant infrastructure structures within natural and significant natural wetlands as a Controlled Activity. The new rule should be worded as follows: <u>Rule RXX: Activities in natural wetlands and significant natural wetlands - Controlled activity. Activities for the purpose of maintenance, repair, addition, alteration, or replacement (like for like) of an existing structure, that are not permitted by rules R104 and R105, are controlled activities provided the following condition is met: (a) The activities relate to existing structures that are components of regionally significant infrastructure; (b) the activity shall comply with the wetland general conditions for activities in natural wetlands, significant natural wetlands and outstanding natural wetlands specified above in Section 5.5.2</u> | Support | As an alternative to the relief sought by Transpower in its submission, that sought by Wellington Electricity is supported as it provides a pragmatic approach to recognising and providing for regionally significant infrastructure. | Allow the point should the relief sought by Transpower in its original submission not be accepted |
| Rangitane o Wairarapa Inc | S279/185 | Amend Rule R104 : Structures in natural wetlands and significant natural wetlands - permitted activity. Amend the rule to include an exclusion for additions and new structures in sites of significance to tangata whenua and to provide a new rule for these activities to ensure that a resource consent application is required. | Oppose | Transpower opposes application of discretionary activity or non-complying activity status to any permitted activity on the basis that such an approach would be overly onerous and not reflect the scale of effects associated with the permitted activities. | Disallow the point |
| Environmental Defence Society Incorporated | S110/015 | Amend Rule R107 : Replace discretionary activity status with non-complying. | Oppose | Discretionary activity status is supported and provides the opportunity for a full assessment of the effects. Non-complying activity status is considered overly onerous and is not supported. | Disallow the point |

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| NZ Transport Agency | S146/167 | Amend Rule R107 : <i>The following activities in a natural wetland or significant natural wetland except for those stipulated in and carried out in accordance with a restoration management plan under Rule R106:</i> <i>(a) the placement of new structures with a footprint of 10m2 or greater for the purpose of hunting and recreation (including maimai and jetties), and all other structures,</i> <i>... (d) the operation, maintenance, upgrade and development of regionally significant infrastructure</i> <i>... (k) reclamation (including drainage or diverting of water to an extent that the area affected ceases to have the characteristics of a natural wetland), are discretionary activities.</i> | Support | As an alternative to the relief sought by Transpower in its submission, that sought by the NZ Transport Agency is supported as it recognises and provides for regionally significant infrastructure. | Allow the point |
| NZ Transport Agency | S146/169 | Amend Rule R109 <i>The following activities in an outstanding natural wetland identified in Schedule A3 (outstanding wetlands), except those stipulated in and carried out in accordance with a restoration management plan under Rule R106: (a) the maintenance, repair or replacement (like for like) of existing structures, (b) the placement of new structures of an area less than 10m2 for the purpose of hunting and recreation (including maimai and jetties) (c) activities associated with the operation, maintenance, upgrade or development of regionally significant infrastructure, including reclamation and the discharge of stormwater, (d) the removal of existing structures, (e) removal of pest plants that are not permitted by Rule R105 are discretionary activities.</i> | Support | As an alternative to the relief sought by Transpower in its submission, that sought by the NZ Transport Agency is supported as it recognises and provides for regionally significant infrastructure. | Allow the point |
| NZ Transport Agency | S146/170 | Amend Rule R106 and R109 : <i>The following activities, in an outstanding natural wetland identified in Schedule A3 (outstanding wetlands), except for those stipulated in and carried out in accordance with a restoration management plan under Rule R106 or enabled as a discretionary activity under Rule 109: (a) the discharge of water or contaminants other than stormwater... (c) the placement of new structures with an area 10m2 or greater for the purpose of hunting and recreation (including maimai and jetties), and all other structures, ...</i> | Support | As an alternative to the relief sought by Transpower in its submission, that f sought by the NZ Transport Agency is supported as it recognises and provides for regionally significant infrastructure. | Allow the point |
| NZ Transport Agency | S146/173 | Add a new rule for existing structures in all rivers and lakes: <i>Existing permitted or otherwise lawfully established structures in any river or lake existing at the date of notification of the Proposed Natural Resources Plan, and the use of those structures, is a permitted activity.</i> | Support | The rule is supported as it recognises existing lawfully established activities. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | Transpower position | Reasons | Relief sought |
|---|----------------------|---|---------------------|---|---|
| NZ Transport Agency | S146/181 | Amend Rule R125 : Structures within a site identified in Schedule C (mana whenua) - restricted discretionary activity. <i>The placement or construction and subsequent use of a river crossing structure, a culvert, new small dam, or other small structure that that is fixed in, on, over or under the bed of a river within a site identified in Schedule C (mana whenua), including any associated: . . . (l) unless the structure and use is associated with the use, operation, maintenance, upgrade or development of regionally significant infrastructure in which case (h) - (k) do not apply. Matters for discretion: 1. Effects on sites with significant mana whenua values. 2. The functional need and operational requirements of regionally significant infrastructure.</i> | Support | Notwithstanding the relief sought in its submission, Transpower supports the relief sought by the NZ Transport Agency as it provides for regionally significant infrastructure which is often subject to locational and operational constraints. | Allow the point should the relief sought by Transpower in its original submission not be accepted |
| Royal Forest and Bird Protection Society | S353/154 | Change activity status for Rules R126 and R127 to prohibited | Oppose | A change in activity status is opposed as it is considered overly onerous. The activity status as notified allows for a full consideration and assessment of effects. | Disallow the point |
| NZ Transport Agency | S146/182 | Amend Rule R127 : <u>Except for the reclamation associated with infrastructure of regional significance which is regulated under Rule 129, t</u> The reclamation of... | Support | The amendment is supported as it provides clarity as to the activity status. | Allow the point |
| 5.7 Rules – Coastal Management | | | | | |
| Rangitane o Wairapa Inc | S279/213 | The rules in this section that require discretionary or non-complying consent for activities within sites identified in Schedules A to F are supported. Where rules do not require discretionary or non-complying consent for activities within sites in those schedules, rules should be amended or added to do so. Rules should be amended and added to manage the actual and potential effects of oil and gas exploration and extraction, and mining of minerals and other materials from the coastal marine area, through resource consents of a status no lower than restricted discretionary activity status. | Oppose | The submission point is opposed in part in relation to the request that <i>'Where rules do not require discretionary or non-complying consent for activities within sites in those schedules, rules should be amended or added to do so'</i> . The outcome sought through this relief is unclear but Transpower opposes the application of discretionary activity or non-complying activity status to any permitted or controlled activities on the basis that such an approach would be overly onerous and not reflect the scale of effects associated with the permitted and controlled activities. | Disallow the point |
| Wellington International Airport Limited | S282/058 | Retain Rule R149 : Maintenance or repair of structures - permitted activity | Support | The rule is supported as the activity status is appropriate in the context of the nature and scale of the likely effects of the activity. | Allow the point |
| NZ Transport Agency | S146/199 | Amend Rule R155 to include a new matter for discretion: <i>11. whether the structure is associated with the use, operation, maintenance, upgrading or development of regionally significant infrastructure</i> | Support | The new matter of assessment is supported as it appropriately recognises regionally significant infrastructure. | Allow the point |

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| NZ Transport Agency | S146/202 | Retain Rule R162 , subject to providing for a new rule managing new structures, additions or alterations to a structure and the associated use of the structure inside a site or habitat identified in Schedule C (mana whenua), Schedule F4 (coastal sites), Schedule F5 (coastal habitats) or Schedule J (geological features) in the coastal marine area where associated with regionally significant infrastructure. | Support | Given the importance and benefit of regionally significant infrastructure, Transpower supports a discretionary rule where there is a functional and operational need. Such an activity status is appropriate and still allows a full assessment of the effects. | Allow the point |
| NZ Transport Agency | S146/204 | Amend Rule R164 : Matters for discretion 8. <u>whether the structure is associated with the use, operation, maintenance, upgrading or development of regionally significant infrastructure</u> | Support | Given the importance and benefit of regionally significant infrastructure, Transpower supports this further matter of discretion. | Allow the point |
| NZ Transport Agency | S146/208 | Amend Rule R182 : <u>Occupation of space by regionally significant infrastructure and a structure owned by a network utility operator - permitted activity. The occupation of space in the common marine and coastal area by a structure existing before the date of public notification of the Proposed Natural Resources Plan (31.07.2015) which is regionally significant infrastructure or owned by a network utility operator is a permitted activity.</u> | Support | The amendments are supported as they clarify that the rule applies to regionally significant infrastructure. | Allow the point |
| Wellington International Airport Limited | S282/074 | Rule R204 : WIAL seeks that the relationships between Rules R165, R166, R194, R204, R208, R210 and R216 be reviewed to ensure that unnecessary duplication of control is avoided and that an all-inclusive non-complying activity status is not applied to activities that are otherwise provided for by the Proposed Plan. | Support | Transpower agrees the relationship is unclear and that further clarity would assist in plan interpretation and application. | Allow the point |
| NZ Transport Agency | S146/217 | 5.7.19 Destruction Add a new rule or amend rule 204 to specifically provide for destruction, damage or disturbance inside a site of significance as a discretionary activity where associated with regionally significant infrastructure | Support | Discretionary activity status recognises the role, importance and benefits of regionally significant infrastructure. Such an activity status is appropriate and still allows a full assessment of the effects. | Allow the point |

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Or Post:

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PO Box 11646
Manners Street
Wellington 6142

DETAILS OF FURTHER SUBMITTER:

- *¹ I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

* **Name:** Geoff Salmond

Name of Organisation you represent:

***Address:** 162b Queens Dr

Lyll Bay
Wellington

***Phone/ Fax** 021 0226 888

EMAIL ADDRESS: geoffsalmond@yahoo.com

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 I do wish to be heard in support of my further submission; and, if so,
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Address for contact : Mitchell's Partnerships Ltd.
PO Box 489 Dunedin, 9054
Email **Claire.hunter@mitchellpartnerships.co.nz**
CC. **greg.thomas@wlg.aero**

I oppose submitter 282 in regard to the following points:

WIAL Submission Page 5 Paragraph xi:

Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

Policy 15(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment;

Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library:
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“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

It should be pointed out that from case law the precedence is with respect to environmental impacts that they are assessed on, what is there today, not what it used to be like.

For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before the old structure was there, it is the impact on the existing environment.

In this case, it would mean that WIAL cannot argue that because the historic human-induced changes to Lyall Bay resulted in a high-quality surfing break, it does not have to consider it or that it has no value because it's not 'natural'. Furthermore, and most importantly, the reclamation may be manmade (i.e. not natural), however, the break that formed beside it formed naturally due to coastal processes and is an entirely natural feature in response to human intervention (it is comprised of swell, currents, water levels, seabed morphology and wind, as per Schedule 1 of the NZCPS).

Relief Sought:

- Dismiss Wial's decision sought to** remove Objective 037,
- Dismiss Wial's decision sought to** revise Schedule K of the PNRP with intent to remove the Corner surf break.
- Dismiss Wial's decision sought to** delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and
- (b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

Policy 13 Preservation of natural character

2 (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

I note that other policies in the PNRP that relate to natural features (such as 4.6.5 Natural features and landscapes and special amenity landscapes (b))refer to avoid, remedy, or mitigate.

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Note:

The deletion I seek is indicated by strikethrough, the addition I seek is indicated by bold and underline

SIGNED:

*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

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* **Name:** Geoff Salmond

Name of Organisation you represent:

***Address:** 162b Queens Dr

Lyll Bay
Wellington

***Phone/ Fax** 021 0226 888

EMAIL ADDRESS: geoffsalmond@yahoo.com

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My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

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Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

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WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library:
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I support the inclusion of this objective in the PNRP.

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I support in part Policy p51

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- (b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

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Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

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* I am a person who has an interest in the PNRP that is greater than the interest the general public has. **DM**

* **Name:** Douglas Mason

Name of Organisation you represent:

***Address:** 11/D Ghuznee Street, Te Aro, Wellington. 6011

***Phone/ Fax** 021510933

EMAIL ADDRESS:

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- | | |
|--|--|
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Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by ~~minimising~~ **avoiding remedying, or mitigating** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and
- (b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Note:

The deletion I seek is indicated by strikethrough, the addition I seek is indicated by bold and underline

SIGNED: Douglas Mason

*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

Please note:

All information included in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on the GWRC website and will include all personal details included in the further submission.

PLEASE CC THIS EMAIL TO WIAL, AN OBLIGATION OF THE FURTHER SUBMISSION PROCESS:

Claire.hunter@mitchellpartnerships.co.nz

or by Post:

Wellington International Airport Ltd
c/o Mitchell Partnerships Ltd
P.O. Box 489
Dunedin 9054

Submitter ID:

File No:

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (PNRP). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

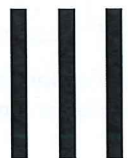
Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Colin Crampton

ORGANISATION (* the organisation that this submission is made on behalf of)

Wellington Water Limited

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

Private Bag 39804
Wellington Mail Centre 5045

PHONE

04 910 3852

FAX

EMAIL

colin.crampton@wellingtonwater.co.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

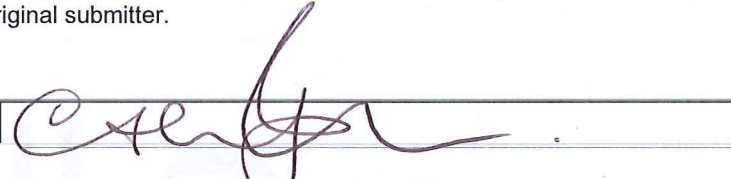
Wellington Water is owned by the Hutt, Porirua, Upper Hutt and Wellington city councils and Greater Wellington Regional Council. We manage the drinking water, wastewater and stormwater services in the public interest and are responsible for the environmental effects of these activities. The PNRP sets the RMA framework for carrying out our obligations under the Local Government Act to provide these services to meet the current and future needs of communities for good-quality local infrastructure in a way that is most cost-effective for households and businesses.

Service of your further submission

Please note that you must serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:



Date:

23 March 2016

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|--|---|--|---|--|
| Name of person/group making original submission and postal address. e.g. Joanne Bloggs 12 Pine Tree Avenue Redwood | The original submission number can be found on the submitter address list. e.g. submitter S102 | Whether you support or oppose the submission. e.g. Oppose | Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. e.g. Oppose all of submission point S102/41 | Why you support or oppose each submission point. e.g. The submission point does not recognise... | The part or whole of each submission point you wish to be allowed or disallowed. e.g. Disallow the parts of S102/41 relating to... |
| Powerco NZ Ltd, Private Bag 2061, New Plymouth 4342 | S29 | Support | S29/62. Definition "bore" | As an alternative to providing an explicit rule for well pointing and where it is associated with excavations of short duration, it is practical to exclude well pointing from this definition. However, for greater clarity, it would be beneficial to provide a separate definition of "well pointing". | Amend the definition of bore as follows: A structure or hole (but not including temporary well pointing (up to 2 months)) in the ground constructed for the purpose of:- investigating or monitoring the conditions below the ground surface, or- abstracting liquid substances from the ground, or- discharging liquid substances into the ground. |
| NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145 | S146 | Support | S146/013. Definition "Dewatering" | Dewatering can also occur through the diversion of groundwater. | Amend the definition of 'dewatering' as follows: The abstraction <u>or diversion</u> of groundwater so as to lower the water table for the period of time required to enable maintenance, excavation, construction, or geotechnical work to proceed in the dewatered area, or to sustain a lower localised water table. |
| NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145 | S146 | Support | S146/014. Definition "Earthworks" | Bores, including geotechnical bores, have their own definition and rule structure, so bores should not be classified earthworks. | Amend the definition: The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised. Earthworks includes blading, |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|---|
| | | | | | <p>contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking. Earthworks do not include: (a) (i) <u>The construction, repair or maintenance of a bore or geotechnical investigation bore.</u></p> <p>(i) <u>The placement or construction of ballast, rip rap, gabions, groynes or other protective materials or structures.</u></p> <p>Amend to include upgrade: (d) the construction, repair, <u>upgrade</u> or maintenance of: (i) pipelines, and (ii) electricity lines including the National Grid, and (iii) telecommunication structures or lines, and (iv) radio communication structures, and (v) firebreaks or fence lines (e) <u>upgrade</u>, repair or maintenance of existing roads and tracks, and</p> |
| <p>Transpower NZ Ltd, C-/ Boffa Miskell Limited, PO Box 11 340, Level 4, Huddart Parker Building 1 Post Office Square, Wellington 6142</p> | S165 | Support | S165/048. Definition "Earthworks" | <p>Include "upgrade" to ensure ongoing operations are effective and efficient and not unduly restricted by earthworks provisions. This generally would not result in additional environmental effects.</p> | |
| <p>NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145</p> | S146 | Support | S146/027. Definition "Operational requirement" | <p>Health and safety is an operational requirement in today's environment and should be included.</p> | <p>Amend the definition of operational requirement: When an activity needs to be carried out in a particular location or way in order to be able to function <u>safely</u>, effectively and efficiently.</p> |
| <p>Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council, c/- Tonkin & Taylor Limited, PO Box 2083, Wellington 6140</p> | S85 | Support | S85/005. Definition "Property" | <p>It is unclear how many of the rules relating to stormwater and earthworks maximum limits per property apply to discharges and earthworks on locations such as rivers, roads, parks and gardens.</p> | <p>Make the necessary amendments to clarify how the air quality, stormwater and earthworks rules apply to publicly owned areas such as rivers and roads.</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145 | S146 | Support | S146/031. Definition "Reverse sensitivity" | The definition needs to protect maintenance, upgrade and development of existing activities to be effective. | Amend the definition of reverse sensitivity: The vulnerability of an existing lawfully-established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activities, thereby creating the potential for the operation, <u>maintenance, upgrade and development</u> of such existing activity to be constrained. |
| Transpower NZ Ltd, C-/ Boffa Miskell Limited, PO Box 11 340, Level 4, Huddart Parker Building 1 Post Office Square, Wellington 6142 | S165 | Support | S165/006. Objective O13 Protecting regionally significant infrastructure | Maintenance and upgrade of infrastructure is also required as well as use and operation for it to be safe, effective and efficient. | Amend Objective O13 to the effect of: The ongoing use, and ongoing operation, maintenance and upgrade of regionally significant infrastructure and renewable energy generation activities |
| Centreport Ltd, PO Box 794, Hinemoa Street, Wellington 6140 | S121 | Support | S121/028. Objective O22 Hard engineering | Regionally significant infrastructure sometimes has the functional need to operational requirement to be protected by hard engineering to protect its integrity and function. | Amend Objective O22 to the effect of: Hard engineering mitigation and protection methods are only used as a last practicable option <u>unless there is a functional need or operational requirement.</u> |
| Powerco NZ Ltd, Private Bag 2061, New Plymouth 4342 | S29 | Support | S29/008. Objective O44 Land use impacts on soil and water | The RMA requires that adverse effects are avoided, remedied or mitigated. | Modify O44 to the effect of: The adverse effects on soil and water from land use activities are <u>avoided, remedied or mitigated.</u> |
| NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145 | S146 | Support | S146/078 4. Policies | Regionally significant infrastructure typically has an operational lifespan well beyond the maximum term of consent and the community has an expectation that these services will be provided in the long term. Long term consents | Add a new policy to provide direction on the duration of operational consents for infrastructure of regional significance. Resource consent durations for regionally significant infrastructure applications required under ss13, 14 and 15 of the RMA will generally be granted |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------------|--|---|---|
| <p>NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145</p> | <p>S146</p> | <p>Support</p> | <p>S146/076 Policy P4 Minimising adverse effects</p> | <p>encourage investment and optimal solutions for environmental benefit.</p> <p>We are concerned with the concept of reducing adverse effects to the smallest possible. The policy should be refocused to offer the best practicable option for regionally significant infrastructure which takes into account the social, economic, cultural and environmental factors. Including cost implications and affordability for communities for necessary infrastructure is important.</p> | <p><u>for the maximum period of time unless reasons are identified during the consent process that make this inappropriate.</u></p> <p>Replace the policy to focus on achieving the best practicable option, rather than minimising effects to the smallest amount practicable. <u>In sensitive locations, regionally significant infrastructure and other activities, shall consider the best practicable option to determine whether the proposed use and development is appropriate. In this context, the best practicable option means considering which site, route or method is the most appropriate for preventing or minimising effects on the environment while taking into account:</u></p> <p><u>(a) the nature and location of the activity, especially for regionally significant infrastructure, and the sensitivity of the receiving environment to adverse effects; and (b) the presence of existing development and whether the activity or development can effectively and efficiently utilise existing physical resources; and (c) the functional and locational needs and operational requirements associated with the activity; and (d) the financial implications of that option when compared to other options; and (e) the effects on the environment of that option when compared with other</u></p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| Powerco NZ Ltd, Private Bag 2061, New Plymouth 4342 | S29 | Support | S29/014. Policy P4 Minimising adverse effects | The policy needs to be practicable for infrastructure that is necessary and expected by the community. | <u>options; and (f) the current state of technical knowledge and the likelihood that the option can be successfully applied.</u> Modify Policy P4 to the effect of: Where minimisation of adverse effects is required by policies in the Plan, minimisation means reducing adverse effects of the activity to the smallest amount practicable and may include: (a) consideration of alternative practicable locations and methods for undertaking the activity including, (b) where relevant, a location outside of areas identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule E (historic heritage), Schedule F (indigenous biodiversity), and |
| Powerco NZ Ltd, Private Bag 2061, New Plymouth 4342 | S29 | Support | S29/014. Policy P5: Review of existing consents | The review needs to be relevant to the effects of the exercise of the particular consent, and it needs to be clear that environmental effects are not attributable to other causes, be they exercise of other consents or natural causes. Uncertainty will affect investment decisions for asset managers. | Add to the policy to the effect of: "... where evidence can be produced of adverse effects attributable to the exercise of the consent." |
| Wellington City Council, PO Box 2199 Wellington, 6140 | S286 | Support | S286/001 4.2 Beneficial use and development | The existing urban environment and resource for future urban growth is important for the community and cannot operate or be developed without some use of natural resources. | Include a new policy (or similar) in Section 4.2 Beneficial use and development: Recognise the contribution existing urban areas, identified urban growth areas and infrastructure make to the |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|--|--|---|
| | | | | | <u>social, economic and cultural wellbeing of people and communities and provide for their ongoing use and development.</u> |
| Porirua City Council, PO Box 50-218 16 Cobham Court, Porirua 5240 | S163 | Support | S163/049 Policy P7: Uses of land and water | The policy should include the management of stormwater to protect communities from flooding. | Amend subclause (b) to read: "treatment, management, dilution and disposal of wastewater and stormwater..." |
| NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145 | S146 | Support | S146/080 Policy P7: Uses of land and water | Construction and operational water supply should be recognised in the context of the benefits it delivers to the region. | Amend Policy 7: The cultural, social and economic benefits of using land and water for: (a) Treatment, dilution, conveyance and disposal or wastewater and stormwater, and ... (k) Transport over, under, adjacent, along, and access to, water bodies (l) Construction and operational water supply for regionally significant infrastructure shall be recognised. |
| Centreport Ltd, PO Box 794, Hinemoa Street, Wellington 6140 | S121 | Support | S121/043 Policy P8: Beneficial activities | Amend the policy to recognise that maintenance and use but also upgrade of structures are beneficial. | Amend Policy P8 as follows: ... h) maintenance, use and upgrading of existing structures in the coastal marine area, natural wetlands and the beds of rivers and lakes, and.... |
| Powerco NZ Ltd, Private Bag 2061, New Plymouth 4342 | S29 | Support | S29/017. Policy P14: Incompatible activities adjacent to regionally significant infrastructure and renewable electricity generation activities. | Reverse sensitivity is not the only concern associated with incompatible development in proximity to significant infrastructure. The policy should be amended to address any relevant adverse effects from incompatible use and development. | Modify Policy 14 to the effect of: Regionally significant infrastructure and renewable energy generation activities shall be protected ... by locating and designing any new use and development to avoid, remedy or mitigate any adverse effects, including reverse sensitivity effects |
| NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145 | S146 | Support | S146/084 Policy P14: Incompatible activities adjacent to regionally significant infrastructure | The policy implies that only the existing infrastructure is addressed and it not clear that the efficient and effective use, maintenance, | Amend Policy 14: Regionally significant infrastructure reverse sensitivity effects which may compromise the efficient and effective |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------------|--|--|--|
| <p>NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145</p> | <p>S146</p> | <p>Support</p> | <p>and renewable electricity generation activities. S146/090 Policy P25: Natural character</p> | <p>upgrading replacement or development of that infrastructure may also be compromised. The policy can be simplified and apply an effects based approach as opposed to a bottom-line approach. It should acknowledge some use and development is appropriate, for example, regionally significant infrastructure.</p> | <p>use, maintenance, upgrading replacement or development of that infrastructure. Amend Policy 25: Use and development shall avoid, remedy or mitigate significant adverse effects on natural character in the coastal marine area (including high natural character in the coastal marine area) and in the beds of lakes and rivers, taking into account: (d) whether the use and development is appropriate after considering: (i) the use of alternative locations, or form of development that would be more appropriate to that location; and (ii) the extent to which functional need or existing use limits location and development options; (iii) whether the use or development is regionally significant infrastructure.</p> |
| <p>NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145</p> | <p>S146</p> | <p>Support</p> | <p>S146/091 Policy P26: Natural processes</p> | <p>This policy is not consistent with the effects based approach of the RMA.</p> | <p>Amend Policy 26: Use and development will avoid, remedy or mitigate effects on the integrity and functioning of natural processes. Reconsider the use of the term 'avoid' and ensure that it does not unnecessarily and inappropriately constrain activities that result in effects that are significant and/or provide essential services for the health and safety of the community and protection of the environment. Provide a policy framework that provides a pathway for new infrastructure reasonably needed to support existing or planned future development to gain</p> |
| <p>Hutt City Council, 531 High Street, Private Bag 31912, Lower Hutt 5040</p> | <p>S84</p> | <p>Support</p> | <p>S84/017 Policy P27: High hazard areas</p> | <p>Some regionally significant infrastructure must be in high hazard areas for functional reasons, so the policy should be less absolute in terms of restrictions.</p> | <p>Reconsider the use of the term 'avoid' and ensure that it does not unnecessarily and inappropriately constrain activities that result in effects that are significant and/or provide essential services for the health and safety of the community and protection of the environment. Provide a policy framework that provides a pathway for new infrastructure reasonably needed to support existing or planned future development to gain</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|--|
| Centrepoint Ltd , PO Box 794, Hinemoa Street, Wellington 6140 | S121 | Support | S121/053 Policy P28: Hazard mitigation measures | A presumption to avoid hard engineering solutions where there is a functional need and operational requirement is inappropriate. | resource consent. This would allow for resource consent for these activities to be granted in appropriate circumstances. Amend Policy P28 as follows: Hard engineering mitigation and protection methods shall be avoided except where (a) there is a functional and operational need; or (b) It is necessary to protect existing and planned future development from unacceptable risk, |
| Federated Farmers of New Zealand , PO Box 715 Wellington 6140 | S352 | Support | S352/139 Policy P31: Aquatic ecosystem health and mahinga kai | Minimising adverse effects of regionally significant infrastructure could potentially be difficult to do and come with very high costs. Prefer to use the effects based approach of the RMA by replacing "minimise adverse effects" with "avoid, remedy or mitigate". | Replace "minimise adverse effects" with "avoid, remedy or mitigate significant adverse effects" in conditions (a)-(d) and (f)]. Amend (e): ...e) avoid remedy or mitigate creating barriers to the migration or movement of indigenous aquatic species, and restore the connections between fragmented aquatic habitats where appropriate, and... |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council , c/- Tonkin & Taylor Limited, PO Box 2083, Wellington 6140 | S85 | Support | S85/033 Policy P34: Fish passage | The policy uses overly strong wording "avoid" which could unduly restrict appropriate and important such as in-stream works necessary for operating, maintaining, developing and upgrading regionally significant infrastructure. | Amend P34 so that it refers only to circumstances where fish passage is justified, for example based on habitat assessment, and reflects the importance of regionally significant infrastructure. |
| NZ Transport Agency , PO Box 5084 Lambton Quay, Wellington 6145 | S146 | Support | S146/099 Policy P36: Effects on indigenous bird habitat | Minimising adverse effects of regionally significant infrastructure could potentially be difficult to do and come with very high costs. Prefer to use the effects based | Amend Policy 36: The adverse effects of use and development on the habitats of indigenous birds in the coastal marine area, wetlands and beds of lakes and rivers and their margins for breeding, |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|--|--|--|
| Wellington City Council, PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | S286/034 Policy P44: Protection and restoration of sites with significant mana whenua values | approach of the RMA by replacing "minimise adverse effects" with "avoid, remedy or mitigate". The degree of restoration or protection of sites of significance needs to be in the context of the degree of existing development of the site that currently exists, particularly if it is in an urban environment. | roosting, feeding, and migration shall be avoided, remedied or mitigated. Amend the policy (or include a new policy) to recognise that some sites of significance to Mana Whenua are within a modified/artificial urban environment. |
| Powerco NZ Ltd, Private Bag 2061, New Plymouth 4342 | S29 | Support | S29/028. Policy P67: Minimising effects of discharges | The focus should be on the concentration of the contaminant not the absolute volume. | Modify Policy 67 to the effect of: ...(c) minimising the volume or amount of the contaminant in the discharge, and/or... |
| NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145 | S146 | Support | S146/114 Policy P67: Minimising effects of discharges | Minimising adverse effects of regionally significant infrastructure could potentially be difficult to do and come with very high costs. Prefer to use the effects based approach of the RMA by replacing "minimised" with "avoid, remedy or mitigate". | Amend Policy 67: The adverse effects of discharges of contaminants to land and water will be avoided, remedied or mitigated by: (a) avoiding the production of the contaminant |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council, c/- Tonkin & Taylor Limited, PO Box 2083, Wellington 6140 | S85 | Support | S85/025 Policy P97: Managing sediment discharges | It is unclear whether "surface water bodies" include artificial drains that lead to sediment treatment devices. The definition for "source control" does not relate well to sediment generation. It is unclear how offsetting would be applied to applications involving sediment discharges. | Revise the policy and associated definitions to improve clarity as to its meaning, and to only relate to effects on natural water bodies. For example, definitions and use of the terms 'surface water body', 'drain', 'source control', 'offset'. |
| Petroleum Exploration and Production Association of New Zealand, PO Box 5227 | S102 | Support | S102/002. Policy P92: Discharges from hydraulic fracturing | The policy is in 2 halves. The second half which starts "Well casings shall be designed..." is about how to build a good bore. | Replace the second half which starts "Well casings shall be..." to the effect of: Well or bore siting, construction, alternation, or decommissioning must be |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|--|
| Lambton Quay, Wellington 6145 | | | | <p>We support a better alternative taken from Taranaki Regional Council to replace this second half of policy P92, which better addresses protection of aquifers from contamination and also more clearly states good bore construction and management.</p> | <p>managed in a way that: (a) complies with recognised standards, codes of practice, or regulations, particularly in relation to the maintenance of well or bore integrity and decommissioning; (b) avoids aquifer cross-contamination or aquifer contamination from open or unsealed wells or bores, and from other operational activities; (c) selects best practice drilling and construction methods, including the type of muds and other construction materials used; (d) minimises effects on the reliability of groundwater supply for properly constructed, efficient and fully functioning existing bores; and (e) ensures that well or bore logs are prepared and made available for the construction or alteration of wells or bores."</p> |
| <p>Hutt City Council, 531 High Street, Private Bag 31912, Lower Hutt 5040</p> | S84 | Support | <p>S84/019 Policy P102: Reclamation or drainage of the beds of lakes and rivers</p> | <p>The operation, maintenance and upgrade of regionally significant infrastructure may require these types of activities as the best practicable option. The policy framework should not make it unduly difficult to carry out functions expected by the community for normal services.</p> | <p>Reconsider the use of the term 'avoid' and ensure that it does not unnecessarily and inappropriately constrain activities that result in effects that are significant and/or provide essential services for the health and safety of the community and protection of the environment. Provide a policy framework that provides a pathway for new infrastructure reasonably needed to support existing or planned future development to gain resource consent. This would allow for resource consent for these activities to be granted in appropriate circumstances.</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|--|---|---|
| Wellington City Council, PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | S286/020 Policy P102: Reclamation or drainage of the beds of lakes and rivers | A balanced approach would be identify the priority streams where piping is to be avoided, based on a range of criteria, and other areas where piping might be acceptable. A hierarchy of provisions could then differentiate between streams and match which ones could appropriately be piped. | Undertake an assessment of stream systems within identified growth areas (in conjunction with WCC) to identify the values and level of modification of streams. This information should then be used to inform the development of rules and policies that recognise the values of streams, and identify where and when the reclamation of stream beds may be appropriate and where it is not appropriate. |
| NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145 | S146 | Support | S146/125 Policy P105: Protecting trout habitat | (b) and (e) need to be qualified by what is appropriate and capable of being practicably achieved. | Amend Policy 105 by adding 'to the extent practicable' to the end of sub clauses (b) and (e). |
| CentrePort Properties Limited, PO Box 794, Wellington 6140 | S141 | Oppose | S141/031 Policy P136 Hutt Valley aquifer zone in Wellington Harbour (Port Nicholson) | The aquifer could be in this area. GWRC has or should have the science to clearly delineate the extent of the aquifer. Until that is clarified, we take a precautionary approach because the potential adverse effects on the aquifer are great. | Retain policy as notified and do not remove the Lambton Harbour Area (Northern Zone) from the Hutt Valley aquifer zone. |
| Centreport Ltd, PO Box 794, Hinemoa Street, Wellington 6140 | S121 | Oppose | S121/077 Policy P136 Hutt Valley aquifer zone in Wellington Harbour (Port Nicholson) | The aquifer could be in this area. GWRC has or should have the science to clearly delineate the extent of the aquifer. Until that is clarified, we take a precautionary approach because the potential adverse effects on the aquifer are great. | Retain policy as notified and do not remove the Commercial Port Area from the Hutt Valley aquifer zone. |
| Hutt City Council, 531 High Street, Private Bag 31912, Lower Hutt 5040 | S84 | Support | S84/020 Policy P138: Structures in sites with significant values | The operation, maintenance and upgrade of regionally significant infrastructure may require these types of activities as the best | Reconsider the use of the term 'avoid' and ensure that it does not unnecessarily and inappropriately constrain activities that result in effects that are significant |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|---|
| Porirua City Council, PO Box 50-218 16 Cobham Court, Porirua 5240 | S163 | Support | S163/007 5. Rules | <p>practicable option. The policy framework should not make it unduly difficult to carry out functions expected by the community for normal services.</p> <p>Case law has determined that tests for permitted activities should be clear and concise</p> <ul style="list-style-type: none"> • not contain subjective terms • be capable of consistent interpretation and implementation by lay people without reference to council officers • not retain later discretions (decision making) to council officers. | <p>and/or provide essential services for the health and safety of the community and protection of the environment.</p> <p>Provide a policy framework that provides a pathway for new infrastructure reasonably needed to support existing or planned future development to gain resource consent. This would allow for resource consent for these activities to be granted in appropriate circumstances.</p> <p>We recommend that the provisions are assessed against the tests for permitted activities set out in the Environment Court decision on Carter Holt Harvey vs Waikato Regional Council A123/08.</p> |
| Hutt City Council, 531 High Street, Private Bag 31912, Lower Hutt 5040 | S84 | Support | S84/023 Rule R62: New wastewater to fresh water - non-complying activity | <p>The activity status should be based on actual effects. For example, a wastewater overflow from a pump station in a heavy rainfall event that inundates the system will be very dilute, into a flooded freshwater body when it would be unsafe to have contact recreation.</p> | <p>Amend Rule R62 and change the activity status from a non-complying activity to a discretionary activity.</p> |
| Porirua City Council, PO Box 50-218 16 Cobham Court, Porirua 5240 | S163 | Support | S163/096 Rule R62: New wastewater to fresh water - non-complying activity | <p>This rule is presumably intended for high volume continuous discharges from wastewater treatment plants into freshwater</p> | <p>Review and amend this rule, taking into account the need to strike a balance between environmental outcomes and the ability of communities to pay for the</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------------|---|--|--|
| <p>Regional Public Health, Private Bag 31-907, Lower Hutt 5040</p> | <p>S136</p> | <p>Oppose</p> | <p>S136/016 Rule R78: Application of biosolids (Ab, Ba, or Bb) to land - restricted discretionary activity</p> | <p>rather than occasional, temporary discharges from overflows during high rainfall events. These situations are significantly different in effects yet both are treated the same. Suggest distinguishing between these extremes and providing less stringent provisions commensurate with activities of lesser effects.</p> <p>Currently emerging contaminants are not well understood and the justification for inclusion is not clear. It is difficult to speculate on the requested "future potential effects". There is uncertainty as to what would need to be monitored. Any monitoring regime is likely to be onerous and expensive and potentially unnecessary. The testing of such substances is also expensive with uncertain outcomes.</p> | <p>substantial upgrades that would be required to comply with the rule. Either clarify whether this rule applies to wet weather overflows, or introduce more lenient provisions for wet weather overflows or provide transitional provisions.</p> <p>Retain the rule as notified and do not add a new clause 10 Matters for discretion: "Measures for monitoring emerging contaminants".</p> |
| <p>Lewis Herrick, Melton Dairies, 1513 RD3 Martinborough</p> | <p>S378</p> | <p>Oppose</p> | <p>S378/81 Rule R83: Discharge of collected animal effluent onto or into land - controlled activity</p> | <p>Community water supply areas need to be protected from potential contaminants.</p> | <p>Retain (e)(iii) as notified and do not delete it as requested.</p> |
| <p>NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145</p> | <p>S146</p> | <p>Support</p> | <p>S146/173 5.5.4 Beds of lakes and rivers general conditions</p> | <p>Existing structures should be permitted activities.</p> | <p>Add a new rule for existing structures in all rivers and lakes <u>Existing permitted or otherwise lawfully established structures in any river or lake existing at the date of notification of the Proposed Natural Resources Plan, and the use of</u></p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------------|--|--|---|
| <p>NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145</p> | <p>S146</p> | <p>Support</p> | <p>S146/172 5.5.4 Beds of lakes and rivers general conditions</p> | <p>The fish passage requirement in (d) should relate to the structure once constructed. It should only apply to new structures, not retrospectively. Fish passage should be able to be temporarily restricted for the practical reasons of construction and maintenance periods where there is no practicable alternative.</p> <p>It is not always possible to contain a diversion within the bed of a river, especially in narrow streams where water may be pumped over or around a working area.</p> <p>It is critical that these conditions are workable and achievable as they need to be complied with by almost all the rules in the section of the plan.</p> | <p><u>those structures, is a permitted activity.</u></p> <p>Amend the 5.5.4 general conditions Beds of lakes and rivers general conditions for activities in the beds of lakes and rivers that apply as specified in Rules R112 to R125: ... (d) <u>Once constructed</u>, structures are designed and installed and maintained, and activities are carried out in a manner to ensure that fish passage is maintained at all times.... and (x) <u>during construction or maintenance works, fish passage shall not be restricted for a duration longer than necessary to undertake the activity and must not be restricted for a period longer than 12 hours in any 72hour period; and ...</u> (i) all reasonable steps shall be taken to minimise the duration of the diversion of water, and any diversion of water required to undertake the activity shall: ...(ii) must be contained within the bed of the river, and...</p> |
| <p>NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145</p> | <p>S146</p> | <p>Support</p> | <p>S146/179 Rule R119: Clearing flood debris and beach recontouring - permitted activity</p> | <p>Clarify by including the word "in" to enable removal of flood debris around piers in the bed of a river which may technically be deemed not to be "on" the bed (ie in flow). Add the functioning of the structure in (e).</p> | <p>Amend to the effect of: The clearing of flood debris <u>in or on</u> the bed of a river or lake, and beach recontouring of the bed of a river (including, but not limited to, beach ripping), including any associated:...</p> <p>(e) the removal of flood debris shall be for the purposes of flood or erosion</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------------|---|---|--|
| <p>NZ Transport Agency, PO Box 5084 Lambton Quay, Wellington 6145</p> | <p>S146</p> | <p>Support</p> | <p>S146/181 Rule R125: Structures within a site identified in Schedule C (mana whenua) - restricted discretionary activity</p> | <p>This rule should be amended to recognise and provide for regionally significant infrastructure.</p> | <p>control or to maintain the integrity or <u>functioning</u> of a structure, and</p> <p>Amend to the effect of: The placement or <u>construction and subsequent use</u> of a river crossing structure, a culvert, new small dam, or other small structure that that is fixed in, on, <u>over</u> or under the bed of a river within a site identified in Schedule C (mana whenua), including any associated:</p> <p><u>(l) unless the structure and use is associated with the use, operation, maintenance, upgrade or development of regionally significant infrastructure in which case (h) – (k) do not apply.</u></p> <p>Matters for discretion: 1. Effects on sites with significant mana whenua values. 2. <u>The functional need and operational requirements of regionally significant infrastructure.</u></p> |
| <p>CentrePort Properties Limited, PO Box 794, Wellington 6140</p> | <p>S141</p> | <p>Oppose</p> | <p>S141/037 Rule R146: Geotechnical investigation bores - permitted activity</p> | <p>The aquifer could be in this area. GWRC has or should have the science to clearly delineate the extent of the aquifer. Until that is clarified, we take a precautionary approach because the potential adverse effects on the aquifer are great.</p> | <p>Retain rule as notified and do not remove the Lambton Harbour Area (Northern Zone) from the Hutt Valley aquifer zone.</p> |
| <p>Powerco NZ Ltd, Private Bag 2061, New Plymouth 4342</p> | <p>S29</p> | <p>Support</p> | <p>S29/052. New Rule R146A: Geotechnical investigation bores - permitted activity</p> | <p>Excavation and dewatering for works on underground assets should not trigger a bore consent. The current definition of bore does</p> | <p>Add new Rule 146A Well pointing for dewatering/diversion</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|--|
| CentrePort Properties Limited, PO Box 794, Wellington 6140 | S141 | Oppose | S141/038 Rule R147: Drilling, construction or alteration of any bore - controlled activity | not capture dewatering activities as the purpose is incidental to the construction or replacement of infrastructure. The aquifer could be in this area. GWRC has or should have the science to clearly delineate the extent of the aquifer. Until that is clarified, we take a precautionary approach because the potential adverse effects on the aquifer are great. | Retain rule as notified and do not remove the Lambton Harbour Area (Northern Zone) from the Hutt Valley aquifer zone. |
| CentrePort Properties Limited, PO Box 794, Wellington 6140 | S141 | Oppose | S141/039 Rule R148: Drilling, construction or alteration of any bore - discretionary activity | The aquifer could be in this area. GWRC has or should have the science to clearly delineate the extent of the aquifer. Until that is clarified, we take a precautionary approach because the potential adverse effects on the aquifer are great. | Retain rule as notified and do not remove the Lambton Harbour Area (Northern Zone) from the Hutt Valley aquifer zone. |
| CentrePort Ltd , PO Box 794, Hinemoa Street, Wellington 6140 | S141 | Oppose | S121/106 5.7.2 Coastal management general conditions | The aquifer could be in Lambton Harbour Area (Northern Zone). GWRC has or should have the science to clearly delineate the extent of the aquifer. Until that is clarified, we take a precautionary approach because the potential adverse effects on the aquifer are great. | Retain condition (c) as notified and do not allow submission point S121/106. |
| CentrePort Properties Limited, PO Box 794, Wellington 6140 | S141 | Oppose | S141/040 Coastal management general conditions: disturbance (a) - (d). | The aquifer could be in this area. GWRC has or should have the science to clearly delineate the extent of the aquifer. Until that is clarified, we take a precautionary | Retain provision as notified and do not remove the Lambton Harbour Area (Northern Zone) from the Hutt Valley aquifer zone. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|--|---|--|
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council , c/- Tonkin & Taylor Limited, PO Box 2083, Wellington 6140 | S85 | Support | S85/059 Rule R154 : New temporary structures outside sites of significance - permitted activity | approach because the potential adverse effects on the aquifer are great. Temporary damming of coastal water can be required to create a dry work environment for construction of some stormwater or 3 waters structures. As damming would be limited to the duration of the associated works, it should be permitted, subject to reasonable conditions. General conditions 5.7.2(i) requires all work to be contained in the CMA which may not be the best practicable method. | Amend Rule R154 to provide for temporary damming of coastal water as a permitted activity (subject to reasonable conditions). Remove the requirement for all work to be contained in the CMA from general condition 5.7.2(i). |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council , c/- Tonkin & Taylor Limited, PO Box 2083, Wellington 6140 | S85 | Support | S85/063 Rule R197 : Motor vehicles for certain purposes - permitted activity | The rule should be extended to include motor vehicle use for the protection of regionally significant infrastructure, as well as its upgrade, maintenance and upgrade. | Amend Rule R197 to provide for 'works for the protection' of regionally significant infrastructure |
| Porirua City Council , PO Box 50-218 16 Cobham Court, Porirua 5240 | S163 | Support | S163/154. Method M15 : Regional stormwater working group | Developers need to be included in discussions about new development areas and provisions of stormwater or alternatives such as water sensitive design. | Add a new method to the effect: "Integration with local authorities and developers in planning for stormwater management within overlay areas" "Wellington Regional Council will work with territorial local authorities in considering stormwater management for future development proposals within urban growth planning overlay areas as part of comprehensive development plan approvals for such development." |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| Federated Farmers of New Zealand , PO Box 715 Wellington 6140 | S352 | Support | S352/247. Method M17: Reduce waste and use water and energy efficiently | Industry needs to be involved in water efficiency and conservation. | Wellington Regional Council will work with city and district councils and industry to reduce waste and encourage... |
| Wellington City Council , PO Box 2199 Wellington, 6140 | S286 | Support | S286/028. Schedule F1: Rivers and lakes with significant indigenous ecosystems | The Wellington City urban stormwater system consists of sections of open stream and piped sections. It is not clear how the policy approach of 'protect and restore' and 'avoid, remedy, mitigate or offset' applies to the piped sections and what the implication of this is for the watercourse as a whole. | Clarify how the policy approach of 'protect and restore' and 'avoid, remedy, mitigate or offset' applies to piped sections of Schedule F1 streams. |
| Wellington City Council , PO Box 2199 Wellington, 6140 | S286 | Support | S286/029. Schedule F1: Rivers and lakes with significant indigenous ecosystems | The Wellington City urban stormwater system consists of sections of open stream and piped sections. It is not clear how this approach can be applied to the piped sections and what the implication of this is for the watercourse as a whole. | Amend the policy framework to acknowledge the difference between piped and natural streams in Schedule F1. |
| Hutt City Council , 531 High Street, Private Bag 31912, Lower Hutt 5040 | S84/010 | Support | S84/010. Schedule F2c: Habitats for indigenous birds in the coastal marine area | Identification of significance to birds appears to be based on sightings not actual value to the birds. Sightings are likely to be greater where there is public access and visibility by the public such as Wellington harbour. | Use a scientifically robust method for identification of areas of significance to birds, that recognises the actual value of the sites. |
| Centreport Ltd , PO Box 794, Hinemoa Street, Wellington 6140 | S121/146 | Oppose | S121/146. Map 30: Hutt Valley aquifer zone in Wellington Harbour (Port Nicholson) | The aquifer could be in this area. GWRC has or should have the science to clearly delineate the extent of the aquifer. Until that is clarified, we take a precautionary | Disallow this submission point S121/146 and retain Map 30 as notified. Do not amend Map 30 to remove the Lambton Harbour Area (Northern Zone) from the extent of the Aquifer as requested. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|---------------|
| | | | | <p>approach because the potential adverse effects on the aquifer are great.</p> | |

Submitter ID:

File No:



greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

Further Submission

on Proposed Natural Resources Plan
for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

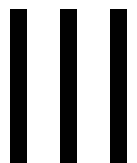
Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

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ORGANISATION (* the organisation that this submission is made on behalf of)

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Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
- I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature: _____ Date: _____

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
- I do wish to be heard in support of my further submission; and, if so,
- I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|---------------|--|-----------------|
| Entire Plan / General | | | | | |
| Wellington Water Limited | S135/216 | Entire Plan Re-balance to reduce the amount of regulation and increase the use of 'Other Methods' to enable more collaboration and sharing of risks between GWRC and councils, applicants and the community. | Support | SWDC is supportive of the approach to use other methods to achieve the desired outcomes and on this basis is supportive of the submission point. | Allow the point |
| Wellington Water Limited | S135/215 | Entire Plan A section 32A analysis (required with the decisions on this proposed plan) that gives effect to the requirements for a cost-benefit analysis with consideration of efficiency and effectiveness be provided. | Support | As outlined in SWDC's original submission (refer <i>General Relief Sought</i> bullet point 3), SWDC supports a full review of the Section 32 reports, in particular the costs associated with the proposed regulatory framework. Given the significant regulatory interventions proposed under the PNRP, a section 32A report that provides a more comprehensive cost benefit analysis is required. | Allow the point |
| Hutt City Council | S84/001 | Entire Plan Reconsider the use of the term 'avoid' and ensure that it does not unnecessarily and inappropriately constrain activities that result in effects that are significant and/or provide essential services for the health and safety of the community and protection of the environment. HCC does not rule out the use of a non-complying activity status in limited cases. | Support | While SWDC does not in principle oppose the use of the term 'avoid', it is concerned where the term is used for those activities which do not have significant effects or for those activities which are necessary for the functioning and wellbeing of the community, such as regionally significant infrastructure. In relation to non-complying activity status, as outlined in SWDC's original submission (page 11, bullet point 6) the plan should provide a regulatory framework for regionally significant infrastructure and local authority roading which is based on controlled, restricted discretionary or discretionary status, not a default to non-complying. A non-complying activity status for such activities is unnecessarily restrictive and has significant costs implications. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/001 | Entire Plan Reconsider the use of the term 'avoid' wherever used in the PNRP and ensure that it does not unnecessarily and inappropriately constrain activities that result in effects that are not significant and/or provide essential services for the health and safety of the community and protection of the environment. For example, consider qualifying it by avoiding "significant adverse effects" (Policy P53) rather than avoiding all effects. | Support | While SWDC does not oppose the use of the term 'avoid', it is concerned where the term is used for those activities which do not have significant effects or for those activities which are necessary, such as regionally significant infrastructure. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|-----------------|--|-----------------|
| Wellington Water Limited | S135/208 | Schedule N: Stormwater management strategy Schedule N should be restructured to take a risk management approach that aligns with the asset management systems used to manage the stormwater networks. Wellington Water is in the process of developing such an alternative schedule and we are keen to work with GWRC to finalise it. The schedule should exclude elements of asset management and focus on providing limits and outcomes to be met. It should only include elements that network managers have in their control. | Support in Part | Should Schedule N not be deleted as sought in SWDC's original submission, SWDC supports restructuring of the schedule subject to clarification as to the exact outcome sought in terms of content. | |
| Masterton District Council | S367/134 | 2.1.6 Definitions, schedules and maps Oppose That all maps be deleted, revised for scale and accuracy and renotified for consideration | Support | As outlined in SWDC's original submission (refer General Relief Sought bullet point 9), SWDC supports a full review of the maps and reliance on the GIS system. Given the implications of the maps, plan users need to be assured of their accuracy and certainty. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/062 | 12 Schedules Amend Review the extent of scheduled sites to ensure their accuracy. Revise all rules relating to scheduled sites to ensure they apply only when the feature to be protected is affected. Insert Schedule F5, or remove reference to it in the PNRP. | Support | As outlined in SWDC's original submission (refer <i>General Relief Sought</i> bullet point 5)) SWDC supports a full review of the schedules and the process by which sites were included. Given the implications of the schedules, plan users need to be assured of their accuracy and certainty and the appropriateness of the application of corresponding rules. | Allow the point |
| Mt Victoria Residents' Association Inc (MVRA) | S162/002 | Entire Plan Not stated The Proposed Plan does not reflect all elements of the Regional Policy Statement, and does not meet its integrated planning requirements. | Support | As outlined in SWDC's original submission (refer <i>General Relief Sought</i> bullet point 4), SWDC supports a full review of the policy framework against the policy framework of the RPS to ensure consistency. On this basis the submission point is supported. | Allow the point |
| 1. Introduction | | | | | |
| Porirua City Council | S163/003 | 1.4 Integrated catchment management [Concerns regarding introducing the whitua provisions as plan changes and the implications for consenting requirements; decision requested not stated]. | Support | As outlined in SWDC's original submission, SWDC is concerned how any Plan Change emanating from the Whitua process will change other parts of the plan, and the relationship between the outcomes of the process and operative standards. Such changes may create a need for review of provisions already fully considered through this plan development process. As sought in SWDC's original submission (<i>General Relief Sought</i> bullet point 10,) SWDC seeks inclusion of the outcomes of the Ruamahanga Whitua process prior to submissions being heard. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|---------------|---|-----------------|
| NZ Transport Agency | S146/003 | 1.4 Integrated catchment management Provide a mechanism for industry representation, including infrastructure providers, to be involved in the whitua committees, especially in the context of regulatory mechanisms. Address concerns that the whitua committees may generate inconsistent provisions within the PNRP. | Support | Given the potential for significant changes to the NRP as a result of the whitua process, SWDC supports the inclusion of interested and affected parties in the development process. While parties will be able to input into any formal plan change process arising from the whitua process, it would seem more efficient to have parties involved in the development of the provisions, particularly given the relationship and impact on other provisions in the NRP are unclear. | Allow the point |
| Point Howard Association Inc | S403/002 | 1.4 Integrated catchment management The proposed plan should lay down what opportunities exist for general public input to be provided prior to decisions being finalised for the Whitua prepared plans. Submitter is assuming that the final sign-off on any decision affecting our natural resources will be at a meeting of the relevant committee of the GWRC and that opportunity for input from members of the public will be provided. | Support | Given the potential for significant changes to the NRP as a result of the whitua process, SWDC supports the inclusion of interested and affected parties in the development process. While parties will be able to input into any formal plan change process arising from the whitua process, it would seem more efficient to have parties involved in the development of the provisions, particularly given the relationship and impact on other provisions in the NRP are unclear. | Allow the point |
| Kapiti Coast District Council | S117/001 | 1.5.1 Statutory framework Insert a new paragraph under paragraph 2 page 9 <i>"District Plans are regulatory, and restrict use of land that would otherwise be unregulated. District Plans, like Regional Plans, must give effect to national and regional policy statements. Activities can span jurisdictional boundaries, and trigger requirements under both regional and district plans"</i> | Support | The recognition of cross boundary issues is supported, and SWDC supports the introductory statement. A simplified approach may be to amend the new paragraph as follows: <i>"Rules in DP's have the effect of regulations and like regional plans must"</i> | Allow the point |
| Kapiti Coast District Council | S117/002 | 1.5.2 Community views, scientific and technical information - identifying issues Insert a new paragraph 1.5.3 <i>"Role of territorial authorities"</i> as follows: <i>"Many issues in the region are shared with the territorial authorities. The territorial authorities can have roles as joint promoters, for example through supporting initiatives through funds and other incentives, as service providers managing activities such as stormwater and wastewater that have positive environmental outcomes, as regulators in common for activities that span boundaries (such as vegetation in wetlands) or affect both regional and district functions (such as earthworks), and as joint implementers of matters such as issuing consents, monitoring, and enforcement. To achieve the best outcomes for communities therefore the different agencies need to work together."</i> | Support | SWDC supports the statement as it highlights the need for a collaborative and integrated approach. | Allow the point |
| 2. Interpretation | | | | | |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|---------------|---|--------------------|
| NZ Transport Agency | S146/007 | Add new definition which aligns with the RMA: Section 2 Interpretation definition of the term: <u>Best practicable option</u> means the best site, route or method for preventing or minimising the adverse effects on the environment having regard, among other things, to-- (a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and (b) the financial implications, and the effects on the environment, of that option when compared with other options; and (c) the current state of technical knowledge and the likelihood that the option can be successfully applied | Support | Consistent with SWDC's original submission point S366/012, SWDC supports the inclusion of a definition, noting that the term only appears to be used in Policy 150 relating to noise and lighting. | Allow the point |
| Federated Farmers of New Zealand | S352/045 | Sensitive area Amend For the purpose of rules xx, A sensitive area includes the following means: • Dwelling house • Educational facilities • Amenity areas and public places • Group drinking water supplies and community drinking water supply protection areas • Surface water bodies and associated riparian vegetation • Non-target plants, crops, which are sensitive to agrichemicals • Organically certified properties, e.g., Bio-Gro • Natural wetlands, outstanding waterbodies, and ecosystems with significant values listed in Schedule F | Neutral | The term Sensitive Area is used within Rule 15 Spray coating not within an enclosed space, and Rule 36 Agrichemicals. On the basis there would be many products covered under the term 'agricultural use' which could be used without any risk to the water supply, SWDC is neutral on this submission point. An alternative approach could be to focus on risk chemicals. | Neutral |
| Wellington Water Limited | S135/030 | Unused water Change the definition to specifically exclude community drinking water suppliers. Alternatively, provide a separate definition for a community drinking water supply to the effect of requiring justification of unused water by way of a risk management framework. | Support | The term 'unused water' is used within Policy 119 (relating to re-allocation of unused water). SWDC supports the exclusion of community drinking water suppliers from the definition given the associated human health needs. | Allow the point |
| Kaiwairua Dairies Limited | S119/047 | Category 2 surface water body If water races included in definition then only include those wider than 1 metre. | Oppose | In SWDC's original submission (S366/018) SWDC sought references to drains and water races be deleted given they are generally artificial and have specific functional requirements. The function does not change depending on the width of the water race and on this basis the 1m width provision is opposed. | Disallow the point |
| Porirua City Council | S163/030 | Regionally significant infrastructure Amend definition to include municipal landfills. Amend definition to clarify what strategic telecommunications and radio communications facilities are. | Support | SWDC supports the inclusion of municipal landfills given the regional role and importance of such activities. However this support relates to operating/open landfills and not closed landfills. | Allow the point |
| Wellington Water Limited | S135/026 | Regionally significant infrastructure Replace the sixth bullet point with " <i>the local authority water supply network, water treatment plants and intake works</i> " or similar. | Support | SWDC supports the additional wording as it clarifies that intake works are included, which are an integral part of water supply facilities. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|---------------|---|--------------------|
| Wellington City Council | S286/014 | Regionally significant infrastructure Amend the definition of Regionally Significant Infrastructure to include all roads; or Ensure that the objectives and policies recognise and provide for the local roading network, in a similar way as they provide for Regionally Significant Infrastructure. | Support | Consistent with SWDC's original submission point S366/019, SWDC supports the inclusion of all roads within the definition or, if this relief is not accepted, that roads are provided for in the objectives and policies. Given the importance of the overall road network to the functioning of the region, it is appropriate they are recognised and provided for. | Allow the point |
| Wellington Water Limited | S135/031 | Upgrade Change "current standards" to "community decided levels of service" or to like effect. Change the definition so that infrastructure can accommodate growth. | Oppose | In SWDC's original submission point S366/027, SWDC sought the wording "current accepted standard or accepted industry practice standard (where defined in an adopted industry standard or similar)". SWDC has concerns with the term "community decided levels of service" given the uncertainty such a term poses given it is open to interpretation as to what is a community decided level of service. SWDC is not opposed to the concept of using community service levels if that is referring to what is in an LTP, but the council is concerned with how such terminology linkages and connections would be made. On this basis the reference to industry standards is supported. | Disallow the point |
| 3. Objectives | | | | | |
| Atiawa ki Whakarongotai | S398/005 | 3. Objectives Support Objectives in sections 3.1, 3.6, 3.7 are critical. Objectives in sections 3.10, 3.13, 3.16, 3.17 are supported. Objectives that refer to mahinga kai are crucial to role of kaitiaki. | Oppose | SWDC is not in principal opposed to the term mahinga kai, but seeks that it be used where appropriate in context of the objective. | Disallow the point |
| Atiawa ki Whakarongotai | S398/007 | 3. Objectives Amend Where practical the Plan should indicate timeframes within which objectives will be delivered | Oppose | Without the benefit of being able to comment on specific timeframes, SWDC opposes the imposition of timeframes on the basis such provisions would have significant implications for regionally significant infrastructure. | Disallow the point |
| Carterton District Council | S301/024 | 3. Objectives Amend Objectives O5, O16, O17, O23, O25, O26, O27, O33, O35 and O50 and the accompanying explanatory text to acknowledge the need to allow time (longer than the 10-year life of the Natural Resources Plan) for communities to remove their discharges of treated wastewater from surface water and to provide for the continued discharge of treated wastewater to water in specific circumstances (subject to discretionary activity consent). | Support | The clarification sought by Carterton District Council is supported as while SWDC is committed to improving water quality, sufficient time is required to achieve the outcomes sought. It must also be recognised that in some circumstances the discharge of treated wastewater to surface water will be necessary. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|-----------------------------|---|--------------------|
| Rangitane o Wairarapa Inc | S279/063 | 3. Objectives Amend Add new objective which sets out outcomes associated with taking, using, damming and diversion of water, including: The taking, use, damming and diversion of fresh water is managed to: a) avoid the transfer of water between water bodies that are not within the same catchment or between catchments. b) Protect the Mauri of rivers, lakes, wetlands, groundwater and other natural resources, c) Recognise and provide for the relationship of Maori, and their culture and traditions, with land, water, waahi tapu, sites of significance and other taonga, d) Avoid adverse effects on Nga Taonga Nui a Kiwa and Outstanding natural landscapes and features (including Outstanding water bodies) e) Safeguard ecosystem health and mahinga kai | Oppose (as already in plan) | While SWDC does not specifically oppose the outcomes sought, a specific objective is not considered necessary as the matters are adequately covered elsewhere in the objective and policy framework. | Disallow the point |
| Rangitane o Wairarapa Inc | S279/012 | Objective O2: Importance of land and water Amend Amend as follows; <i>The importance and contribution of land and water, and ecological systems and processes, to the social, economic and cultural well-being, and the health of people and the community are recognised.</i> | Oppose (as already in plan) | While SWDC does not specifically oppose the amendment contents, the changes are not supported as ecological systems are managed under Section 3.6 of the PNRP. | Disallow the point |
| Land Matters LTD | S285/021 | Objective O5: Fresh and coastal water Amend <i>Fresh water bodies and the coastal marine area, as a minimum, are managed to: (a) safeguard aquatic ecosystem health and mahinga kai; (b) provide for contact recreation secondary recreational contact and/or provision of potable water and Maori customary use, and (c) in the case of fresh water, provide for the health needs of people secondary recreational contact and/or provision of potable water.</i> Add a new definition for 'secondary recreational contact'. | Neutral | In SWDC's original submission (S366/035), SWDC supported the retention of clause c). SWDC is at this stage neutral on the amendment to the clause as sought by S285/021 until the changes to the objective overall are clarified. | Neutral |
| Federated Farmers of New Zealand | S352/056 | Objective O5: Fresh and coastal water Amend as follows or to similar effect: <i>"freshwater bodies and the coastal marine area, as a minimum, are managed to a) safeguard aquatic ecosystem health and mahinga kai; and b) provide for contact recreation and maori customary use; and c) provide for the health needs of people provide an appropriate balance across values and uses in a catchment.</i> | Neutral | SWDC is neutral on the relief sought, noting that in its original submission it sought retention of clause c). | Neutral |
| Fish and Game | S308/016 | Objective O7: Water for livestock Amend objective O7 to ensure that provision of water for livestock is not contrary to s14(3)(b) and that it does not cause significant adverse effects on aquatic life and occurs within water quantity limits | Oppose | Section 3.2 and the corresponding objectives relate to 'Beneficial use and development'. Matters relating to water allocation and ecological systems are better addressed under other objectives and on this basis the submission point is opposed. | Disallow the point |
| Royal Forest and Bird Protection Society | S353/017 | Objective O8: Allocation regime Oppose Delete | Oppose | As outlined in SWDC's original submission point S366/038, the retention of objective 8 is supported as the social and economic benefits of taking and using water are appropriately recognised within the objective as well as other values, such as environmental and cultural values. On this basis the deletion of the objective is opposed. | Disallow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|----------------|---|----------------------------|
| CentrePort Limited (CentrePort) | S121/023 | Objective O11: Maori customary use Amend Objective O11 as follows: <i>Opportunities for Māori customary use of the coastal marine area, rivers and lakes and their margins and natural wetlands for cultural purposes are recognised, maintained and improved where appropriate.</i> | Support | Should the relief in SWDC's original submission point S366/039 not be accepted, SWDC supports the relief sought by CentrePort Ltd as the additional words recognise opportunities are likely to be vary depending on the circumstances of the use and site. | Allow the point |
| Rangitane o Wairarapa Inc | S279/022 | Objective O11: Maori customary use Amend the objective to ensure: Māori customary use is replaced with appropriate reference to the full extent of the relationship of Māori and their culture and traditions with fresh and coastal water bodies; The ongoing and enduring relationships of tangata whenua over their lands, water, and other resources and sites are appropriately recognised and provided for; and Tangata whenua have the ability to exercise kaitiakitanga over waters, lands and fisheries in the coastal environment. | Oppose in part | For the reasons outlined in SWDC original submission point S366/039 ¹ , the relief sought in point S279/022 is opposed in part in terms of the lack of a definition of Maori customary use. SWDC seeks a definition to provide certainty and assist in plan interpretation and application. | Disallow the point in part |
| Chorus New Zealand Limited | S144/005 | Objective O12: Benefits of regionally significant infrastructure Amend Objective O12 as follows: <i>Objective O12(Coastal) The social, economic, cultural, and environmental and health and safety benefits of regionally significant infrastructure and renewable electricity generation activities.</i> <u><i>Objective O12A Recognise that some regionally significant infrastructure has a functional need and/or operational requirement to be located and/or operated in a particular environment.</i></u> | Support | In addition to the relief sought in SWDC's original submission point S366/040, SWDC supports the amendments by Chorus as it provides greater recognition of functional and operational requirements. | Allow the point |
| Vector Gas Ltd | S145/015 | Objective O13: Protecting regionally significant infrastructure Amend <i>The use and ongoing operation of regionally significant infrastructure and renewable energy generation activities in the coastal marine area are protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.</i> | Support | SWDC supports the amendments sought by Vector Gas Ltd as the removal of reference to the coastal marine area makes it clear the objective should apply to all areas and not just the coastal marine area. This amendment was sought in the reasoning in SWDC's submission point S366/041 (but not shown as strikethrough text). | Allow the point |

¹ The submission point sought the deletion of objective O11 or defining "Māori customary use" to provide certainty as to the implications of the definition.

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|-----------------|--|-------------------------|
| Fish and Game | S308/018 | <p>Objective O17 (and O19 and O22): Natural character Amend section 3.4 and objectives O17, O19, and O22 to: <u>Recognise and preserve aquatic habitat diversity and quality, including the form, frequency and pattern of pools, runs, and riffles in rivers, and the natural form of rivers, lakes, natural wetlands and coastal habitats. Recognise and preserve freshwater habitats that are important to the life cycle and survival of aquatic species Avoid effects of land use activities and activities on the margins of freshwater bodies and their beds at times which will affect the breeding, spawning, and dispersal or migration of aquatic species avoid activities and the placement of structures in the bed of freshwater environments which would create barriers to the migration or movement of indigenous aquatic species restore natural character including the connections between fragmented aquatic habitats where degraded</u></p> <p>Specifically require that flood protection and river management activities are undertaken in a manner which recognises and protects the natural character of freshwater and enhances natural character where degraded such that the provisions listed above are achieved and the natural character narrative and index in Table 3.4 Appendix 3 to this submission is met.</p> | Oppose | <p>SWDC opposes the resulting change in emphasis proposed by the amendments.</p> <p>The sought approach has the potential ability to limit flood protection activities which are of regional and district importance.</p> | Disallow the point |
| Wellington International Airport Limited | S282/011 | <p>Objective O19: Natural processes Delete Objective O19 entirely or amend as follows: The interference from Any adverse effects of use and development on natural processes is are avoided, remedied or mitigated <u>minimised.</u></p> | Support in part | <p>The submission point is supported in part in that SWDC supports the proposed wording amendments as they reduce the subjective nature of the notified wording.</p> <p>While in its submission SWDC did not directly oppose the use of the term 'minimised' or its interpretation as provided in Policy 4, it is unclear how the term "minimised" works in context of a generic objective such as Objective 19.</p> | Allow the point in part |
| Chorus New Zealand Limited | S144/007 | <p>Objective O21: High hazard areas Amend Objective O21 as follows: <u>Inappropriate use and development in high hazard areas is avoided, other than (a) where it has a functional need and/or operational requirement to be located there, and/or (b) where it is necessary to enable the efficient operation of regionally significant infrastructure.</u></p> | Support | <p>As noted by Chorus, given the emphasis on avoid within the objective, the suggested amendment would assist in determining whether the use and development is "inappropriate". Such an amendment would assist with plan interpretation and application of the objective.</p> | Allow the point |
| Nga Hapu o Otaki | S309/010 | <p>Objective O24: Contact recreation and Maori customary use</p> <p>Remove standard and enable whatua to establish limit</p> | Oppose | <p>As outlined in SWDC's original submission, SWDC has concerns with how the whatua process will evolve and the provisions implemented/incorporated within the plan. On this basis the submission point is opposed until such time as the limits proposed by the whatua process are known.</p> | Disallow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|-----------------|--|----------------------------|
| Fish and Game | S308/031 | Objective O31: Outstanding water bodies Amend the objective, policies and rules to ensure that outstanding waterbodies are identified based on a full assessment of their values. Set out the criteria for identifying outstanding waterbodies. <u>Outstanding fresh water bodies and their margins are identified and included in Schedule A, and are protected or if degraded are restored to protect and enhance their values</u> | Oppose in part | SWDC is not opposed to the identification of outstanding water bodies (as sought in SWDC's original submission point S366/051 in that certainty be provided as to the extent and location of scheduled items). However in relation to the specific wording of Objective O31, SWDC seeks the wording proposed in its submission (S366/051) which refers to inappropriate use and development be used. The words protect and enhance do not align with the RMA. | Disallow the point in part |
| Wellington International Airport Limited | S282/019 | Objective O44: Land use impacts on soil and water Amend Objective O44 as follows: <i>The adverse effects on soil and water from land use activities are minimised avoided, remedied or mitigated.</i> | Support | SWDC supports the amended wording as it would provide greater certainty and improve efficiency. While in its submission SWDC did not directly oppose the use of the term 'minimised' or its interpretation as provided in Policy 4, it is unclear how the term "minimised" works in context of a generic objective such as Objective 44. | Allow the point |
| Porirua Harbour and Catchment Community Trust | S33/006 | Objective O50: Wastewater discharges to fresh water Amend Change "reduced" to "eliminated". | Oppose | SWDC opposes the word replacement as it is not always practicable or possible to 'eliminate' all discharges of wastewater to fresh water. As such the absolute nature of the term is opposed. | Disallow the point |
| Rangitane o Wairarapa Inc | S279/060 | Objective O50: Wastewater discharges to fresh water Amend as: <u>New or increases in existing discharges of wastewater to fresh water are not allowed and existing discharges of wastewater to fresh water are progressively reduced so that they are fully phased out by no later than 2030.</u> | Oppose | SWDC opposes the wording sought as it is important to recognise there are operational, practical and financial constraints to small communities to eliminate discharges in a 14 year timeframe; and the outcome of the relief sought has affordability issues for local authorities and their communities. It is further noted the Council's two new consents provide for full land treatment by 2035 (MBO) and 2039(GYTN) and the policy change would be inconsistent with these. | Disallow the point |
| Atiawa ki Whakarongotai | S398/013 | Objective O50: Wastewater discharges to fresh water Oppose Discharge of human effluent to water should be prohibited. The objective should include a timeframe for the reduction of discharges. | Support in part | SWDC supports the relief sought in relation to the discharge of <u>untreated</u> human effluent as it agrees the discharge of untreated effluent to water is inappropriate. | Allow the point in part |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|---------------|--|--------------------|
| Royal Forest and Bird Protection Society | S353/045 | Objective O53: Functional need in the coastal marine area Oppose Replace reference to coastal marine area with coastal environment. Add the following at the end of the objective: <u>and avoids adverse effects on significant indigenous vegetation and significant habitat of indigenous fauna and outstanding landscapes and features in the coastal environment.</u> | Oppose | Objective O53 relates to the functional need or operational requirements within the coastal marine area. Effects on significant vegetation, habitats and outstanding areas are comprehensively addressed in other objectives of the PNRP and are not appropriate in context of the proposed Objective 53. | Disallow the point |
| 4. Policies | | | | | |
| NZ Transport Agency | S146/078 | 4. Policies Add a new policy to provide direction on the duration of operational consents for infrastructure of regional significance. Resource consent durations for regionally significant infrastructure applications required under ss13, 14 and 15 of the RMA will generally be granted for the maximum period of time unless reasons are identified during the consent process that make this inappropriate. | Support | Given the role and importance of regionally significant infrastructure, and the significant costs in obtaining resource consent, direction on the maximum term for consents is supported. | Allow the point |
| Wellington City Council | S286/006 | 4. Policies Remove the use of 'avoid' in the policies. | Support | While SWDC is not opposed to the use of the term "avoid" in all the policies, such terminology needs to be balanced with the actual effects of an activity, and the role and importance of some activities such as regionally significant infrastructure. | Allow the point |
| Wellington City Council | S286/030 | 4. Policies Amend Policies 33, 40 and 41 or include new policies that address the issue of where there may be significant adverse effects as a result of essential works for the maintenance of infrastructure assets (including roads). | Support | The submission point for recognising infrastructure is supported given the essential nature of such works, and their role and importance. | Allow the point |
| CentrePort Properties Limited | S141/020 | Policy P4: Minimising adverse effects Amend: <i>Where minimisation of adverse effects is required by policies in the Plan, minimisation means reducing adverse effects of the activity to the greatest extent reasonably practicable and shall may include... (b) where reasonably practicable, locating the activity away from areas identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule E (historic heritage), Schedule F (indigenous biodiversity), and... (e) designing the activity so that the scale or footprint of the activity is as small as practicable, where it is reasonably practicable to minimise adverse effects on identified areas.</i> | Support | The amendments are supported as they recognise the benefits of an activity, which is particularly relevant in relation to regionally significant infrastructure. The replacement of the word 'shall' with 'may' is particularly supported as it makes it clear that not all the matters/criteria will be relevant in considering the minimisation of adverse effects. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|-----------------|---|-------------------------|
| Minister of Conservation | S75/078 | Policy P4: Minimising adverse effects Amend as follows: <i>(a) avoiding adverse effects of activities on <u>the characteristics and qualities that contribute to the values of outstanding natural features and landscapes, and (b) avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on <u>the characteristics and qualities that contribute to the values of other natural features and landscapes.</u></u></i> | Support in part | While SWDC does not in principle oppose the use of the term 'avoid', as outlined in its submission on S84/001, it is concerned where the term is used for those activities which do not have significant effects or for those activities which are necessary for the functioning and wellbeing of the community, such as regionally significant infrastructure. Notwithstanding the term "avoid" the submission point is supported as the amendments direct the focus and consideration to the values within the area that are to be considered. | Allow the point in part |
| Fish and Game | S308/043 | Policy P4: Minimising adverse effects Oppose Delete and replace with a new policy that ensures that: • sustainable management is achieved • adverse effects are avoided, remedied, and mitigated, and that • significant adverse effects are avoided, and that • the outcomes from the policy are clear; and that • application of the policy is consistent with achieving the freshwater outcomes set in section 3 tables • Avoid adverse effects outstanding habitats; • Avoid adverse effects on natural wetlands • Avoid adverse effects on riparian vegetation • Avoid adverse effects on natural character • Avoid adverse effects on ecosystems and habitats with significant biodiversity values • Avoid adverse effects on fish spawning and juvenile rearing habitats and fish migration. | Oppose | In SWDC's original submission on Policy P4 SWDC largely supported the policy subject to amendments. The relief sought by Fish and Game to re-write the policy with a focus on avoidance is opposed as the proposed matters are addressed elsewhere in the plan and the proposed intent fails to reflect the intent of the policy. | Disallow the point |
| CT and EM Brown | S13/003 | Policy P7: Uses of land and water Identify and recognise stormwater channels in the NRP. Provide for their maintenance by Councils and land owners by making this a permitted activity in the NRP. | Support | As outlined in SWDC's original submission, SWDC supports the maintenance of storm water channels as a permitted activity. | Allow the point |
| Kiwi Rail Holdings Limited | S140/030 | Policy P7: Uses of land and water Amend Policy P7 to add: (l) regionally significant infrastructure. | Support | The inclusion of reference to regionally significant infrastructure is supported as such activities have clear social and economic benefits and are appropriately included within the policy. | Allow the point |
| Royal Forest and Bird Protection Society | S353/057 | Policy P8: Beneficial activities Delete (h) | Oppose | The recognition of the benefits and appropriateness of the maintenance and use of existing structures is supported as such structures are often related to regionally significant infrastructure and have an operational or locational requirement for their functioning. Given the structures are existing, their ongoing use and maintenance is beneficial and more economical and on this basis is supported. Deletion of (h) is therefore opposed. | Disallow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|-----------------|---|-------------------------|
| NZ Transport Agency | S146/083 | <p>Policy P13: Existing regionally significant infrastructure and renewable electricity generation facilities</p> <p>Amend Policy 13: <i>The use, operation, maintenance, and upgrade and development of existing regionally significant infrastructure and renewable energy generation activities are beneficial and generally appropriate.</i></p> <p>Or Retain Policy 13 (i.e. excluding 'development') and add a new policy to enable new development: <u><i>The development of new regionally significant infrastructure and renewable energy generation activities to meet the needs of the community are beneficial and are generally appropriate.</i></u></p> | Support | The recognition of the development of regionally significant infrastructure is supported given the importance and benefits of the infrastructure. | Allow the point |
| Rangitane o Wairarapa Inc | S279/080 | <p>Policy P13: Existing regionally significant infrastructure and renewable electricity generation facilities</p> <p>Amend to state where the benefit is accrued and to be clear that adverse effects of the operation, use, maintenance and upgrade can still have adverse effects on the environment and need to be managed. Add in a new policy to ensure that new, or increases in scale or extent of existing, regionally significant infrastructure and renewable energy generation facilities shall avoid causing adverse effects on sites in Schedules A to F, H and J.</p> | Oppose | Policy 13 solely relates to the recognition of the benefits and appropriateness of regionally significant infrastructure and renewable electricity generation facilities. The issues of adverse effects and avoidance on scheduled sites are adequately addressed in other policies within the plan. The use of avoidance is also an absolute term with no context provided as to the scale of the adverse effects. | Disallow the point |
| Rangitane o Wairarapa Inc | S279/081 | <p>Policy P14: Incompatible activities adjacent to regionally significant infrastructure and renewable electricity generation activities</p> <p>Amend to state where the benefit is accrued and to be clear that adverse effects of the operation, use, maintenance and upgrade can still have adverse effects on the environment and need to be managed. Add in a new policy to ensure that new, or increases in scale or extent of existing, regionally significant infrastructure and renewable energy generation facilities shall avoid causing adverse effects on sites in Schedules A to F, H and J.</p> | Oppose | The issues of adverse effects and avoidance on scheduled sites are adequately addressed in other policies within the plan. The use of avoidance is also an absolute term with no context provided as to the scale of the adverse effects. On this basis the submission point is opposed. | Disallow the point |
| Rangitane o Wairarapa Inc | S279/082 | <p>Policy P17: Mauri</p> <p><i>The mauri of fresh and coastal waters shall be recognised as being important to Maori and sustained and enhanced by:</i></p> <p><i>(a) managing avoiding remedying or mitigating the individual and cumulative adverse effects of activities that may impact on mauri in the manner set out in the rest of the Plan including by not allowing activities that will have significant adverse effects on the quality and quantity of fresh and coastal water and their associated ecosystems, and (b) providing for activities that sustain and enhance mauri, and (c) recognising and providing for the role of kaitiaki in sustaining mauri, including by enabling participation of kaitiaki as affected parties in resource consent processes involving discharges to water or discharges to land that may enter water, and activities affecting Sites of Significance to Mana Whenua, water bodies with outstanding cultural and spiritual values and Nga Taonga Nui a Kiwi (sic).</i></p> | Support in part | SWDC supports the mauri of fresh and coastal waters being recognised as of importance to Maori. However, SWDC does not support the blanket requirement for kaitiaki as affected parties in resource consent processes. The issue of notification depends on the specific circumstances of an activity, including the values of a particular waterbody, and each consent should be considered on its merits. Not every consent is relevant to iwi. | Allow the point in part |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|---------------|---|--------------------|
| NZ Transport Agency | S146/089 | Policy P24: Outstanding natural character Amend Policy 24 Areas of outstanding natural character in the coastal marine area will be preserved by: (a) Protecting avoiding adverse effects of activities on natural character in areas of the coastal marine area with outstanding natural character by avoiding inappropriate use and development, and (b) requiring use and development to be of a type, scale and intensity that will maintain the natural character values of the area, and (c) requiring built elements to be subservient to the dominance of the characteristics and qualities that make up the natural character values of the area, and (d) maintaining the high levels of naturalness of these areas, and (e) avoiding the adverse effects of activities, including those located outside the area, that individually or cumulatively detract from the natural character values of the outstanding natural character area. | Support | The amendments sought are supported as they appropriately recognise that it is not all adverse effects which are to be avoided, rather inappropriate use and development. The deletion of clause c) is supported as the policy control should not extend to activities outside the outstanding natural character areas as it is unclear and uncertain where such areas are and how they are identified. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/031 | Policy P27: High hazard areas Amend the definition of high hazard areas so that it is based on an appropriate assessment of actual hazard, rather than inappropriately capturing all river and lake beds AND modify the policy framework to be less absolute in terms of restrictions | Support | Notwithstanding the relief sought in SWDC's original submission, SWDC supports the redefining of what constitutes a high hazard area, and a less absolute policy framework. | Allow the point |
| Atiawa ki Whakarongotai | S398/019 | Policy P31: Aquatic ecosystem health and mahinga kai Amend wording for points (a)-(d) and (f)....."avoiding adverse effects" instead of "minimising adverse effects" | Oppose | The absolute nature of the term "avoid" is opposed in that the wording change sets an unnecessarily high bar with the policy direction to 'avoid' the adverse effects regardless of their scale or significance. | Disallow the point |
| Wellington International Airport Limited | S282/038 | Policy P32: Adverse effects on aquatic ecosystem health and mahinga kai Amend Policy P32 as follows: <i>Significant adverse effects on aquatic ecosystem health and mahinga kai shall be managed by:</i> a) <i>Avoiding significant adverse effects, and</i> b) <i>Where significant adverse effects cannot be avoided, remedying them, and</i> c) <i>Where significant adverse effects cannot be remedied, mitigating them, and</i> d) <i>Where <u>significant</u> residual adverse effects remain, <u>considering</u> the use of biodiversity offsets. Proposals for mitigation and biodiversity offsetting will be assessed against the principles listed in Schedule G (biodiversity offsetting).</i> | Support | The amendments are supported as they clarify that offsets are only required to be considered for significant residual effects and not all residual effects. | Allow the point |
| Wellington Water Limited | S135/080 | Policy P62: Promoting discharges to land Amend Suggest that qualifiers are added that include consideration of the assimilative capacity of the soil, potential erosion and odour effects, reverse sensitivity effects, inability to use such land for agricultural production for market sensitivity reasons, and provide for rules to allow for practical discharges of effluent. | Support | As outlined in SWDC's original submission, SWDC acknowledges the intent of the policy but the issues associated with achieving the intent will take time. The qualifiers proposed in submission point S135/080 acknowledge some of the issues with land disposal and on this basis are supported. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|---------------|---|--------------------|
| Rangitane o Wairarapa Inc | S279/113 | Policy P62: Promoting discharges to land Amend Policy P62 as follows: Policy P62: <i>Promoting Requiring discharges to land The discharge of contaminants to land shall occur in situations where direct discharge of contaminants to water will cause adverse effects on:(a) aquatic ecosystem health(b) mahinga kai(c) contact recreation, or (d) Māori customary use.</i> | Oppose | For the reasons outlined in SWDC's original submission point S366/080, SWDC opposes the term "requiring" as it is unduly restrictive. The relief sought also raise affordability issues for local authorities and their communities. | Disallow the point |
| Fish and Game | S308/060 | Policy P63: Improving water quality for contact recreation and Maori customary use Amend so that the policy requires water quality to be managed for primary contact recreation and not secondary contact recreation. | Oppose | The requirement for primary contact recreation is opposed as it is considered overly onerous, restrictive and unaffordable. | Disallow the point |
| Dairy NZ and Fonterra Co-operative Group Ltd | S316/071 | Policy P70: Managing point source discharges for aquatic ecosystem health and mahinga kai Amend Policy P70 as follows: " <i>(a) (i) the application ..., in accordance with good management practice, within 5 years from the date the consent takes effect the term of the resource consent, and (ii) conditions on the resource consent require the reduction of adverse effects of the activity in order to improve water quality in relation to the objective within 5 years from the date the consent takes effect the term of the consent, and...</i> " | Oppose | SWDC opposes the imposition of a 5 year time constraint. | Disallow the point |
| Rangitane o Wairarapa Inc | S279/122 | Policy P70: Managing point source discharges for aquatic ecosystem health and mahinga kai Amend the policy and other provisions in the Plan to ensure that improvements to existing discharges is time-bound, that the improvements are meaningful and measurable, and that in water bodies where the objectives are not met, the discharge does not cause a further decline in water quality. The management of point source discharges of contaminants should be undertaken using the same system of accounting as the management of non-point source discharges. Clause (b) should be amended to refer to NPSFM terminology around allocation status, and should be amended to be clear that new discharges cannot cause water quality to degrade from the quality that exists and, where freshwater objectives are not met, the discharge is no allowed. Clarify the policy so that it does not apply to new point source discharges of wastewater or other contaminants that are culturally offensive to Maori and their customs and traditions. Delete the reference off-setting residual adverse effects. | Oppose | In context of its original submission, SWDC opposes the submission point. In particular SWDC is concerned with the how the provision relating to 'clarify the policy so that it does not apply to new point source discharges of wastewater or other contaminants that are culturally offensive to Maori and their customs and traditions' would apply to Councils. The intent of the amendments relating to the management of point source and non-point source discharges is unclear. | Disallow the point |
| Carterton District Council | S301/046 | Policy P73: Minimising adverse effects of stormwater discharges Oppose Delete Policy P73 or amend it to clarify that it addresses significant adverse effects of stormwater only (if there are any in particular case). | Support | The suite of policies impose a significant work programme and associated costs on TLA's over a short timeframe, and on this basis the deletion of the policy is supported. | Allow the point |
| Masterton District Council | S367/135 | Policy P73: Minimising adverse effects of stormwater discharges Oppose [Not stated] | Support | Although no specific relief is sought, SWDC supports the submission point opposing Policy 73 and supports the deletion of the policy. The suite of policies impose a significant work programme on TLA's over a short timeframe. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|----------------|--|----------------------------|
| Rangitane o Wairarapa Inc | S279/123 | Policy P73: Minimising adverse effects of stormwater discharges Amend. To ensure the Plan is directive in the regard, the policies should include dates by which the outcomes will be achieved. That includes a date by which existing contamination of stormwater from wastewater networks is resolved. The discharge of human sewage via stormwater discharges to water is not appropriate and should be resolved as soon as practicable and not later than by 2030. | Oppose | Policy 73 relates to stormwater with wastewater addressed in other policies. SWDC opposes the imposition of a timeframe within Policy 73 in relating to wastewater. Such a timeframe was not included in any section 32 reports and therefore the implications have not been explored. It is also not clear whether the intent sought relates to deliberate discharge or accidental discharges, and how composite systems would be assessed. | Disallow the point |
| Masterton District Council | S367/136 | Policy P77: Assessing resource consents to discharge stormwater containing wastewater Oppose [Not stated] | Support | Although no specific relief is sought, SWDC supports the submission point opposing Policy 77 and supports the deletion of the policy. The suite of policies impose a significant work programme on TLA's over a short timeframe. | Allow the point |
| Wellington Civic Trust | S62/020 | Policy P77: Assessing resource consents to discharge stormwater containing wastewater Support Retain policies unchanged. | Oppose | The suite of policies impose a significant work programme and associated costs on TLA's over a short timeframe, and the retention of the policy is opposed. | Disallow the point |
| Wellington Water Limited | S135/092 | Policy P78: Managing stormwater from large sites Clarify how this policy relates to provisions about local authority stormwater networks. In accordance with recommended policy construction (Quality Planning website) change the policy to be a list of matters of environmental assessment. Clarify the use of "good management practice" or remove the term. | Support | SWDC opposes the regulation of stormwater networks. The concerns raised by Wellington Water Ltd are supported as the implications and application of the policy are unclear. | Allow the point |
| Rangitane o Wairarapa Inc | S279/241 | Policy P83: Avoiding new wastewater discharges to fresh water Amend [see submission point s279/124 ²] | Oppose in part | The exact relief sought in the submission is unclear as submission point S279/124 seeks the retention of policy 83 as notified. SWDC generally supports material changes to existing discharges but needs clarification that economic growth is not prevented by this amendment. | Disallow the point in part |
| Porirua City Council | S163/073 | Policy P96: Managing land use Amend Provide further clarification within the policy to make it more meaningful. | Support | SWDC supports the submission point as the intent of the policy is unclear. The note also makes reference to a "limit, target and/or allocation framework" but it is not clear from the policy what this framework will specifically relate too. | Allow the point |

² S279/124 Policy P80: Replacing wastewater discharge consents

Support with amendments. Retain P83 as notified. New discharges to apply to coastal water, include a 2030 timeframe, ensure existing discharges meet freshwater limits and targets, avoid adverse effects on sites of significance to mana whenua, nga taonga nui a kiwa and outstanding water bodies.

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|---------------|--|--------------------|
| Hutt City Council | S84/019 | Policy P102: Reclamation or drainage of the beds of lakes and rivers Oppose Reconsider the use of the term 'avoid' and ensure that it does not unnecessarily and inappropriately constrain activities that result in effects that are significant and/or provide essential services for the health and safety of the community and protection of the environment. Provide a policy framework that provides a pathway for new infrastructure reasonably needed to support existing or planned future development to gain resource consent. This would allow for resource consent for these activities to be granted in appropriate circumstances. | Support | In SWDC's original submission, SWDC supported policy 102 clause d). The submission point by Hutt City Council is supported as it highlights the importance and role of regionally significant infrastructure. | Allow the point |
| Fish and Game | S308/069 | Policy P102: Reclamation or drainage of the beds of lakes and rivers Delete. Reclamation or drainage of the beds of rivers and lakes should be prohibited | Oppose | The submission point is opposed as a prohibited activity status is disproportionate to the effects of the activity and ignores the need for reclamation in some circumstances and for some activities. | Disallow the point |
| 5. General | | | | | |
| Porirua City Council | S163/165 | Rules Amend [Make clear how rules apply to sites classified in multiple schedules e.g. Pauatahanui Inlet - does Rule R109 or R162 take precedence?] | Support | SWDC supports the submission point seeking clarification on the relationship between, and application of, multiple rules to a proposed activity. Such clarification would assist in plan interpretation and application. The point aligns with the relief sought by SWDC seeking clarification as to how the term "more specific" is to be applied. | Allow the point |
| 5.1 Rules – Air Quality | | | | | |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/079 | 5.1 Air quality rules Amend the rules so that agrichemical use in public places and roadsides is permitted under similar conditions as the Operative Plan, including that the activity does not require an annual spray plan, neighbour notification, or a risk assessment. Include a cross-reference to Rules R36-R38 in the air discharges rules section to aid the reader. | Support | The submission point is supported as it recognises the overly onerous nature of the notified rules in terms of SWDC's routine weed spraying that takes place on Council owned assets such as parks and roadsides. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/013 | Rule R24: Flaring of gas - discretionary activity Amend Include rules that specifically address the types of air discharges from solid waste disposal activities, and that appropriately differentiates activity status with various levels of effect. | Support | SWDC supports the submission point as the lack of specific rules relating to discharges to air from landfills inappropriately automatically triggers a discretionary activity status. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/016 | Rule R24: Flaring of gas - discretionary activity Amend Include a rule that specifically addresses odour, and in particular provides for minor discharges as a permitted activity. | Support | The submission point is supported as the provision of a specific rule and corresponding activity status would appropriately reflect the nature of the effects. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|-----------------|---|-------------------------|
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/014 | Rule R24: Flaring of gas - discretionary activity Amend Include a rule that provides for minor discharges to air from landfills as a permitted activity | Support | The submission point is supported as the provision of a specific rule and corresponding activity status would appropriately reflect the nature of the effects. | Allow the point |
| Greater Wellington Regional Council | S133/007 | 5.1.8 Food, animal or plant matter manufacturing and processing Amend to permit the refinement of sugars, roasting or drying of berries, grains or plant matter (except roasting of green coffee beans in Rule R30) curing by smoking, flour or grain milling, baking, roasting, deep fat or oil frying not exceeding 250kg/hour of product subject to standard air condition in respect of odour, smoke and dust over the boundary. | Support in part | While SWDC supports the provision of permitted activities, it remains concerned about the limited range of permitted activities. | Allow the point in part |
| 5.2 Rules – Discharges to Water | | | | | |
| Wellington City Council | S286/043 | 5.2.3 Stormwater Rooding, Amend Clarify how Rules 48-53 relate to stormwater runoff from the rooding network and ensure that a resource consent for stormwater run-off is not required. | Support | In SWDC's original submission SWDC sought deletion of Rules R50 and R51 given the resulting potential significant work programme on local authorities in the Wairarapa. The submission point of Wellington City Council raises a further uncertainty associated with the rule and the sought clarification is supported. | Allow the point |
| Wellington Water Limited | S135/142 | Rule R48: Stormwater from an individual property - permitted activity Amend Clarify how the rules relate to stormwater runoff from the local authority road network that goes into the local authority stormwater network. | Support | The submission point of Wellington Water Limited raises an uncertainty associated with Rule R48 and the relief sought clarification is supported as it is presently unclear whether the rule would apply to local roads (that could be considered one property in that they are contiguous and under one ownership). | Allow the point |
| Porirua City Council | S163/088 | Rule R50: Stormwater from a local authority network at plan notification - controlled activity Amend condition (a) to read: "the resource consent application is received within two years of the date that the Natural Resources Plan becomes operative". Introduce a review clause to implement further limits when they are established by the whitua process. Amend Item 3 in Matters of control so that the duration of controlled activity consents is a maximum of 5 years after the Plan is made operative or from the date that consent is granted, whichever is the greater. | Support in part | In the first instance SWDC supports the deletion of Rules R50 and R51 in the first instance, as sought in its original submission. This position remains This position remains, but specific to this submission point, SWDC supports an amended timeframe. Such a timeframe would better reflect the process. | Allow the point in part |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|---------------|--|--------------------|
| Porirua City Council | S163/091 | Rule R53: All other stormwater - discretionary activity Amend. Review the provisions and amend to ensure alignment between the rules for consistency of stormwater management. | Support | As SWDC understands it, Rule R50 and R52 would not apply to local roads. In the first instance SWDC supports the deletion of Rules R50 and R51 in the first instance, as sought in its original submission. On the basis of the lack of clarity as to how the rules in Section 5.2.3 apply to roading (refer submission point S286/043) it could be inferred that local roads within the Wairarapa that are not connected to a stormwater system (i.e. do not have kerbs or swales and so the stormwater discharges directly into adjacent land or water) would not be subject to Rules 50 or 52 and therefore would by default be a discretionary activity under Rule 53. On this basis the relief sought by Porirua City Council is supported. | Allow the point |
| 5.3 Rules – Discharges to Land | | | | | |
| Carterton District Council | S301/058 | Rule R58: Water races - discretionary activity Neither support or oppose CDC seeks clarification of whether the activity requiring consent is the discharge of contaminants into a water race, or discharge of water race water and contaminants into other water. | Support | Notwithstanding SWDC's original submission opposing Rule R58 (refer submission point S366/107) SWDC supports clarification as to whether the activity requiring consent is the discharge of contaminants into a water race, or discharge of water race water and contaminants into other water. | Allow the point |
| Nga Hapu o Otaki | S309/035 | Rule R61: Existing wastewater - discretionary activity Oppose in part Amend R61 to be at discretion of mana whenua values. | Oppose | SWDC acknowledges assessment of mana whenua values may be an appropriate matter to consider in applications under Rule 61. However, as a discretionary activity rule, it does not fit within the rule framework to identify this matter. | Disallow the point |
| Rangitane o Wairarapa Inc | S279/177 | Rule R61: Existing wastewater - discretionary activity Amend the rule to apply to existing discharges up until an appropriate date not later than 2030. Insert a new non-complying activity rule for existing discharges to freshwater after the date specified above. | Oppose | SWDC opposes the amendments sought as they are considered unreasonably restrictive and fail to recognise that small communities need sufficient time to make significant infrastructure changes due to cost and practical constraints. | Disallow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|-----------------|---|-------------------------|
| Hutt City Council | S84/023 | Rule R62: New wastewater to fresh water - non-complying activity Oppose Amend Rule R62 and change the activity status from a non-complying activity to a discretionary activity. | Support in part | The rule is supported in part (in terms of deletion of the non-complying acidity status). If the relief sought in SWDC original submission point S366/108 ³ is not accepted, SWDC supports the change relief sought in submission point S84/023 as the resulting activity status (discretionary) would be the same for new or existing discharges. However, the relief sought in submission point S366/108 is preferred as it simplifies the rule framework and removes the uncertainty as to what is a new or existing discharge. | Allow the point in part |
| Rangitane o Wairarapa Inc | S279/178 | Rule R62: New wastewater to fresh water - non-complying activity Oppose That the rule regarding the new discharge of wastewater to fresh water be amended to state that this is a prohibited activity. | Oppose | A prohibited activity status is opposed as it is overly restrictive and fails to recognise the operational requirements associated with municipal wastewater treatment plants. | Disallow the point |
| NZ Transport Agency | S146/154 | Rule R67: Discharges inside sites of significance - non-complying activity Oppose Amend Rule 67: <i>The discharge of water or contaminants into water, or onto or into land where it may enter water: (a) inside a site or habitat identified in ... and (b) that is not permitted by Rules R42, R43, R44 or R45; and (c) that is not a discharge associated with a regionally significant infrastructure</i> Or introduce a new discretionary rule specific to discharges of water or contaminants into water, or onto or into land where it may enter water from regionally significant infrastructure inside sites of significance. | Support in part | While SWDC does not oppose the non-complying activity status for discharges into sites of significance, it supports clarification as to the relationship with other rules (in particular rules R50, R53 and R61). The approach put forward by NZ Transport Agency is supported. | Allow the point in part |
| Rangitane o Wairarapa Inc | S279/182 | Rule R79: Discharge of treated wastewater - controlled activity Amend Include as matters of control and discretion: the effects of the discharge, including cumulative effects, on meeting the freshwater objectives and limits in the Plan; The effects of the discharge of sites listed in Schedules A to F and H; and The effects on the cultural and spiritual values of mana whenua. Clarified that mana whenua will be considered as potentially affected parties. | Oppose | The additional matters of control requested are already addressed in Rule R79. SWDC opposes the provision of a notification statement relating to mana whenua as such a notification requirement is out of accord with the controlled activity status. | Disallow the point |
| Fish and Game | S308/090 | Rule R79: Discharge of treated wastewater - controlled activity Amend the rule so that activities are required to achieve the freshwater objectives. Insert a new rule that makes existing discharges non-complying after 2030 where freshwater outcomes in section 3 tables are not achieved. New activities which would cause or contribute to the freshwater objectives in section 3 tables being exceeded should be prohibited Give effect to relief sought policy P71 and apply the standards as amended in relation to policy P71 | Oppose | In SWDC's original submission (point S366/113) SWDC sought deletion of Rule 79 and associated re-write. The relief sought by Fish and Game is opposed as it would restrict the ability to undertake discharge to land which is the favoured approach in the policy framework over discharges to water. | Disallow the point |

³ Retain the intent of Rule R61, with an amendment as follows: *Rule R61: Existing-Discharge of wastewater -discretionary activity. The discharge of wastewater: ... (b) that is an existing discharge into fresh water*

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|---------------|---|--------------------|
| Masterton District Council | S367/113 | Rule R79: Discharge of treated wastewater - controlled activity Oppose Delete Rule R79 and rewrite to provide for a Permitted activity rule land discharge of treated effluent; Controlled activity for all other land discharges, subject to reasonable matters of control, not prescriptive operational and asset management directives; and Provision for alternative discharge designs and methods, not a prescriptive standard based on a single method. | Support | SWDC supports the deletion and re-writing of Rule 79. All Rules associated with disposal to land will be very prescriptive for the Wairarapa and are these the right rules for all potential applications – for example salt build up on irrigated land. | Allow the point |
| Rangitane o Wairarapa Inc | S279/259 | Rule R80: Discharge of treated wastewater - restricted discretionary activity Amend [see submission point s279/182] | Oppose | Refer above commentary on point S279/182. | Disallow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/018 | Rule R93: All other discharges to land - discretionary activity Amend Include specific rules addressing discharges to land from landfills. | Support | SWDC supports the submission point as given the importance of landfills, a specific rule is appropriate. | Allow the point |
| 5.4 Rules – Land Use | | | | | |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/022 | 5.4.4 Earthworks and vegetation clearance Not stated Amend the plan to clarify how erosion prone land is to be determined. Amend [rules R99-R101] to clarify how they relate to erosion prone land. | Support | SWDC supports the submission point as the terms and application of the rules are unclear. Specifically, it is unclear how erosion prone land is to be determined. Clarification is also sought that the earthworks rule does not apply to ‘erosion prone land’, rather it is only vegetation clearance which is subject to the term. Such clarification would assist in plan interpretation and application. | Allow the point |
| Upper Hutt City Council | S107/006 | Rule R99: Earthworks- permitted activity Amend the earthworks and vegetation clearance rules to note that approval may also be required from the relevant territorial authority. | Support | The addition of a note would be beneficial in terms of highlighting to plan users that the relevant district plan may also have relevant earthwork provisions which need to be considered. | Allow the point |
| PF Olsen Limited | S131/006 | Rule R101: Earthworks and vegetation clearance - discretionary activity Amend Outline vegetation clearance on non-erosion prone land as a permitted activity. | Support | The submission point is supported as the rules as notified would provide for vegetation clearance on non-erosion prone land as a discretionary activity under the default Rule R101. Such an activity status is overly onerous and is thought to not be the intent of the rule framework. The insertion of a permitted activity rule would assist in plan interpretation and application. | Allow the point |
| 5.5 Rules – Wetlands and Beds of Lakes and Rivers | | | | | |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|---------------|---|-----------------|
| Porirua City Council | S163/115 | Rule R104: Structures in natural wetlands and significant natural wetlands - permitted activity Amend subclause (f) to allow some exemptions for local authorities to use some larger machinery for maintenance and repair where necessary. This can be subject to conditions regarding such matters as refuelling, specified timeframes, etc. | Support | SWDC supports the intent of the rule as notified but supports the submission point in terms of seeking some exemptions for larger machinery. | Allow the point |
| Porirua City Council | S163/117 | Rule R106: Restoration of natural wetlands, significant natural wetlands and outstanding natural wetlands - controlled activity Amend the rule to either permit activities that are stipulated in and carried out in accordance with are approved restoration management plan, or require controlled activity consents to be accompanied by a restoration management plan at the time of consent, so both can be assessed together. | Support | As highlighted in the submission, activities in accordance with an approved restoration management plan have already been assessed as part of the plan process and a permitted activity status suits therefore appropriate. On this basis the submission point is supported. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/078 | Rule R108: Activities in natural wetlands and significant natural wetlands - non-complying activity Reclassify [activities necessary in natural wetlands for roading and parks and gardens activities] as discretionary activities as they were in the Draft Natural Resources Plan (Draft NRP) rather than non-complying. | Support | SWDC supports a discretionary activity status for roading and parks and gardens activities given the importance of these activities and the resulting public benefit. A discretionary activity status still allows for a full assessment of the effects and for consent to be declined. | Allow the point |
| Porirua City Council | S163/118 | Rule R109: Activities in outstanding natural wetlands - discretionary activity Clarify whether structures like erosion protection for walkways are included within the scope of "a structure for the purpose of recreation". Review this and related rules to prove interpretation and practical application regarding multiple rules for the same activity. Define "maintenance", particularly in terms of whether this extends to including any form of upgrade in relation to this rule | Support | For the reasons outlined in the submission, the submission point is supported. | Allow the point |
| Porirua City Council | S163/119 | Rule R111: Reclamation of outstanding natural wetlands - prohibited activity Delete this rule and include reclamation as a non-complying activity under rule R110. | Support | SWDC does not support a prohibited activity status for all reclamation activities as it is concerned unreasonable restive in some circumstances. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/040 | Rule R112: Maintenance, repair, replacement, upgrade or use of existing structures (excluding the Barrage Gates) - permitted activity Not stated Amend the plan to clarify that temporary stream damming and diversion required for in-stream structure works are included in all relevant rules for structures in a river bed, or provide for temporary damming and diversion as a permitted activity (subject to reasonable conditions). | Support | The submission point is supported as it would provide clarity as to whether these activities are included. It is appropriate they are included as they would be limited to the duration of the works. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/038 | Rule R112: Maintenance, repair, replacement, upgrade or use of existing structures (excluding the Barrage Gates) - permitted activity Amend Include 'damming of water' in the list of associated activities that are authorised by the rule. Simplify permitted activity condition (g) of Rule R112 to make it easier to assess proposals against | Support | The submission point is supported as it would provide clarity as to whether damming is included. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|--|-----------------|---|-------------------------|
| New Zealand Defence Force | S81/034 | Rule R117: New structures - permitted activity Amend Make the necessary amendments to R117 to specifically provide for stormwater outlets and in-stream erosion protection structures. | Support | For the reasons outlined in the submission, the submission point is supported in principle. SWDC acknowledges the importance of in-stream structures and in principle agrees they should be specifically provided for. | Allow the point |
| Carterton District Council | S301/064 | Rule R117: New structures - permitted activity Amend Rule R117 to provide for maintenance of stream alignment to protect essential infrastructure. Delete condition R117(i) | Support in part | SWDC supports the amendment to Rule R117 to provide for the maintenance of stream alignment to protect essential infrastructure as such a provision would duly recognise the importance of, and provide for the ongoing use and operation of regionally significant infrastructure. | Allow the point in part |
| Carterton District Council | S301/065 | Rule R121: Maintenance of drains - permitted activity Oppose in part Delete the prescriptive list of conditions from Rules R121 and R122. | Support | SWDC submitted on Rule R121 and R122 seeking their deletion. The submission point by Carterton District Council is supported on the basis the rules are unnecessarily complex and unworkable. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/075 | Rule R135: General rule for taking, use, damming and diverting water - discretionary activity Amend Consider authorising stormwater diversion in the stormwater discharge rules in section 5.2.3 of the NRP (i.e. rule bundling). | Support | As noted in the submission, the PNRP does not specifically address stormwater diversions and whether it would fall under Rule R135. This seems unnecessary given the effects of this activity and therefore the relief sought to authorise stormwater diversions in the stormwater discharge rules in Section 5.2.3 is supported. | Allow the point |
| 5.6 Rules – Water Allocation | | | | | |
| Nga Hapu o Otaki | S309/041 | Rule R136: Take and use of water - permitted activity Amend Rule amended so that 'all water takes from surface water bodies and groundwater have a water meter installed, and records are kept and provided to WRC on request' | Oppose | While SWDC considers there is some uncertainty as to how Clause f) ⁴ is to be assessed and applied as a permitted activity condition, SWDC opposes an outright requirement that a meter be installed for all takes where the other permitted activity conditions are met. Such a requirement would be excessive for landowners and considered unnecessary given the permitted activity status for such takes. It is also noted the 'Resource Management (Measurement and Reporting of Water Takes) Regulations 2010' excludes certain takes (e.g. less than 5 litres per second) due to cost implications. | Disallow the point |
| Dairy NZ and Fonterra Co-operative Group Ltd | S316/125 | Rule R138: Water races - permitted activity Support Retain Rule R138 | Support | The submission point is supported as it appropriately provides for takes from water races which are an important feature and asset in the Wairarapa. | Allow the point |

⁴ Clause f) "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".

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | SWDC position | Reasons | Relief sought |
|---|----------------------|---|---------------|--|--------------------|
| 6. Other Methods | | | | | |
| Nga Hapu o Otaki | S309/048 | Method M15: Regional stormwater working group Oppose in part Method is amended to read: ' <i>WRC will work together with <u>mana whenua</u>, city and district councils in a regional stormwater working group to;</i> ' | Oppose | The submission point is opposed given stormwater is a district council function. | Disallow the point |

Submitter ID:

File No:

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (PNRP). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:

www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

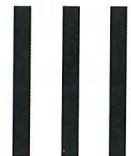
Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
FreePost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

Fold here

FreePost Authority Number 3156



FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Wendy Walker

ORGANISATION (* the organisation that this submission is made on behalf of)

Porirua City Council

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

PO Box 50-218
16 Cobham Court
Porirua 5240

PHONE

04 237 5089

FAX

EMAIL

wwalker@pcc.govt.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

Porirua City Council is a local authority within the Greater Wellington Region. Porirua City Council has responsibility to manage the local network infrastructure (e.g. roads, sewage disposal, water, stormwater) and community infrastructure (libraries, parks and recreational facilities). The Council also has responsibility for environmental management and planning the future needs of the local district. The PNRP sets objectives, policies and methods for the use of the region's resources which Porirua City Council must follow in carrying out their functions.

Service of your further submission

Please note that you must serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:

Wendy Walker

Date:

23.3.16

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------------|--|---|--|
| Name of person/group making original submission and postal address. e.g. Joanne Bloggs 12 Pine Tree Avenue Redwood | e.g. submitter S102 | e.g. Oppose | Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. e.g. Oppose all of submission point S102/41 | Why you support or oppose each submission point. e.g. The submission point does not recognise... | The part or whole of each submission point you wish to be allowed or disallowed. e.g. Disallow the parts of S102/41 relating to... |
| Wellington Water Limited C/- Colin Crampton Private Bag 39804 Wellington Mail Centre Lower Hutt 5045 | S135/105 | Support | Support all of submission point S135/105. Definition: Ephemeral flow path | This request is to amend the definition of ephemeral flow path. The amendments are considered functional and reasonable by Porirua City Council. | Allow submission point S135/105: (a) Amend "does not have an active bed" to be consistent with other definitions. (c) Amend to "only conveys water during, and immediately following a significant rainfall (> than x mm per hour) or similar effect. |
| Dairy NZ and Fonterra Co-operative Group Ltd C/- Oliver Parsons PO Box 10002 Wellington 6143 | S316/028 | Oppose | Oppose all of submission point S316/028. Objective 13: Protecting regionally significant infrastructure. | This request is to add 'regionally significant industry' to Objective 13. Porirua City Council do not consider it appropriate to allow this change. Regionally significant industries are not defined, providing considerable uncertainty as to the range and types of activities, and their related effects, that might fall into and be | Disallow submission point S316/028: Amend Objective O13 as follows: "The use and ongoing operation of regionally significant infrastructure, <u>regionally significant industry</u> and renewable electricity generation activities are protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity." |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|---|
| Fish and Game PO Box 1325 Palmerston North 4440 | S308/043 | Oppose | Oppose all of submission point S308/043. Policy P4: Minimising adverse effects | <p>protected by this definition and be subject to this objective. This change would also afford an unreasonable bias or weighting to prioritising the protection of some industry types, from the sensitivity effects of a range of other legitimate and potentially equally valued other activity types.</p> <p>This request looks to strengthen protection of the environment by requiring the avoidance of adverse effects in many instances, rather than minimisation.</p> <p>Porirua City Council consider this proposed amendment as overly restrictive and not practical in many instances. In some instances effects minimisation may be the only practical option. The submitters request if granted could act to impede future urban development.</p> | <p>Disallow submission point S308/043:</p> <p>Delete and replace with a new policy that ensures that:</p> <ul style="list-style-type: none"> • sustainable management is achieved • adverse effects are avoided, remedied, and mitigated, and that • significant adverse effects are avoided, and that • the outcomes from the policy are clear; and that • application of the policy is consistent with achieving the freshwater outcomes set in section 3 tables • Avoid adverse effects outstanding habitats; • Avoid adverse effects on natural wetlands • Avoid adverse effects on riparian vegetation • Avoid adverse effects on natural character • Avoid adverse effects on ecosystems and habitats with significant biodiversity values • Avoid adverse effects on fish spawning and juvenile rearing habitats and fish migration. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|--|---|---|
| Wellington City Council C/- Alison Newbald PO Box 2199 Wellington 6140 | S286/015 | Support | Support all of submission point S286/015. Policy P4: Minimising adverse effects | This submission requests amending the policy to ensure it is more practicable. Porirua City Council consider the suggestion as appropriate. | Allow submission point S286/015: Amend Policy 4 to state: Where minimisation of adverse effects is required by policies in this plan.....to the smallest amount <u>reasonably practicable</u> and shall include <u>giving consideration</u> to:.... |
| Royal Forest and Bird Protection Society C/- Amelia Geary PO Box 631 Wellington 6140 | S353/053 | Oppose | Oppose all of submission point S353/053. Policy P4: Minimising adverse effects | This submission requests amending the policy to use the words 'avoid, remedy, or mitigate' instead of minimise. Porirua City Council do not consider the amendment as being practicable and that the word minimise is more appropriate. | Disallow submission point S353/053: Delete policy P4 and replace all references to "minimise" in the plan with appropriate language consistent with the RMA, e.g. avoiding, remedying or mitigating. |
| Wellington City Council C/- Alison Newbald PO Box 2199 Wellington 6140 | S286/001 | Support | Support all of submission point S286/001. Section 4.2 Beneficial use and development. | This submission requests a new policy is included in the NRP that provides for the benefits of existing urban areas, identified future urban areas and infrastructure to be recognised. Porirua City Council consider this relief to be reasonable given the significant contribution to social, economic and cultural wellbeing, that is associated with developing land for urban purposes | Allow submission point S286/001: Include a new policy (or similar) in Section 4.2 Beneficial use and development: <u>Recognise the contribution</u> <u>existing urban areas, identified urban</u> <u>growth areas and infrastructure make to</u> <u>the social, economic and cultural</u> <u>wellbeing of people and communities and</u> <u>provide for their ongoing use and</u> <u>development.</u> |
| Hutt City Council C/- Allison Tinsdale Private Bag 31912 Lower Hutt 5040 | S84/003 | Support | Support all of submission point S84/003. Policy P7: uses of land and water. | This submission requests the addition of 'urban use and development' to recognise the importance of this activity in the region. | Allow submission point S84/003: Amend P7 to include 'urban use and development' to the list of uses in Policy 7. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|--|
| Wellington Water Limited C/- Colin Crampton Private Bag 39804 Wellington Mail Centre Lower Hutt 5045 | S135/068 | Support | Support all of submission point S135/068. Policy P33 Protecting indigenous fish habitat. | <p>Porirua City Council consider this to be appropriate and practicable relief.</p> <p>This submission requests a number of changes to ensure the policy is more achievable, while still maintaining the intent of the policy.</p> <p>Porirua City Council support the proposed amendments as they are considered more practicable.</p> | <p>Allow submission point S135/068:</p> <p>In the first paragraph, replace "avoided" with "reduced to a practical minimum" or like effect. Include a practical time element into (c). Either delete "particularly" in the first sentence of the policy or include "relevant migration times" in (c). Revise the language in a way that protects indigenous fish habitat from significant adverse effects (rather than any adverse effect) and to recognise that effects cannot always be avoided completely and nor is it always necessary or appropriate to do so.</p> |
| Royal Forest and Bird Protection Society C/- Amelia Geary PO Box 631 Wellington 6140 | S353/144 | Oppose | Oppose all of submission point S353/144. Rule 107 Activities in natural wetlands and significant natural wetlands - discretionary activity | <p>The submission point requests that (c) is a non-complying activity by moving it to Rule 108.</p> <p>Porirua City Council consider this change to be overly restrictive.</p> | <p>Disallow submission point S353/144:</p> <p>Make (c) a non-complying activity by moving it to Rule 108</p> |
| Environmental Defence Society Incorporated C/- Madeleine Wright PO Box 91736 Victoria Street West Auckland 1042 | S110/015 | Oppose | Oppose all of submission point S110/015. Rule 107 Activities in natural wetlands and significant natural wetlands - discretionary activity | <p>The submission point requests a non-complying activity status, which Porirua City Council consider to be overly restrictive</p> | <p>Disallow submission point S110/015:</p> <p>Replace discretionary activity status with non-complying.</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|--|---|---|
| <p>Roading, Parks and Gardens and Solid Waste departments of Hutt City Council & Upper Hutt City Council</p> <p>C/- John Clemo PO Box 2083 Wellington 6140</p> | S85/077 | Support | <p>Support all of submission point S85/077. Rule 107 Activities in natural wetlands and significant natural wetlands - discretionary activity</p> | <p>The submission point requests to amend the rules to permit local authorities to undertake amenity works in wetlands.</p> <p>Porirua City Council consider the proposed change to be more practicable than the current wording.</p> | <p>Allow submission point S85/077:</p> <p>Amend the rules to permit local authorities to undertake works in wetlands for amenity Purposes to recognise the benefit of this activity.</p> |
| <p>NZ Transport Agency</p> <p>C/- Caroline Horrox PO Box 5084 Lambton Quay Wellington 6145</p> | S146/172 | Support | <p>Support all of submission point S146/172. 5.5.4 Beds of lakes and rivers General Conditions</p> | <p>The submission point requests a more practicable approach to this rule, particularly during construction and maintenance works.</p> <p>Porirua City Council consider the proposed change to be more acceptable than the current wording.</p> | <p>Allow submission point S146/172:</p> <p>Amend the 5.5.4 general conditions Beds of lakes and rivers general conditions for activities in the beds of lakes and rivers that apply as specified in Rules R112 to R125: ... (d) <u>Once constructed, structures are designed and, installed and maintained, and activities are carried-out in a manner to ensure that fish passage is maintained at all times.... and (x) during construction or maintenance works, fish passage shall not be restricted for a duration longer than necessary to undertake the activity and must not be restricted for a period longer than 12 hours in any 72hour period; and . . . (i) all reasonable steps shall be taken to minimise the duration of the diversion of water, and any diversion of water required to undertake the activity shall: ... (ii) must be contained within the bed of the river, and...</u></p> |
| <p>Wellington Water Limited</p> <p>C/- Colin Crampton</p> | S135/226 | Support | <p>Support all of submission point S135/226. 5.5.4 Beds of lakes and rivers General</p> | <p>The submission point requests that the majority of network-related maintenance activities in the beds of streams and rivers be permitted</p> | <p>Allow submission point S135/226:</p> <p>The majority of network-related maintenance activities in the beds of</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|-----------------|--|--|---|
| Private Bag 39804 Wellington Mail Centre Lower Hutt 5045 | | | Conditions | activities with conditions. Porirua City Council consider this request to be practicable given the necessity and temporary nature of the works. | streams and rivers be permitted activities with conditions appropriate to the temporary nature of works and scale of environmental effects. |
| Wellington Water Limited C/- Colin Crampton Private Bag 39804 Wellington Mail Centre Lower Hutt 5045 | S135/160 | Support in part | Support in part submission points relating to conditions (d), (e), (f) and (k) on S135/226. 5.5.4 Beds of lakes and rivers General Conditions | The submission point requests a number of changes to the general conditions, particularly in relation to stormwater networks. Porirua City Council consider this request to be practicable given the necessity of the works. | Allow submission points in relation to conditions (d), (e), (f) and (k) on S135/226: No change to (d). Change to allow for short term stormwater networks maintenance activities to be permitted. (e) & (f) Specify exclusion for storm debris clearance work in the stormwater network. Condition (k) - extend the condition to include removal of flood debris against the stormwater intake structure and immediately upstream of it. |
| Wellington Water Limited C/- Colin Crampton Private Bag 39804 Wellington Mail Centre Lower Hutt 5045 | S135/163 | Support | Support all of submission point S135/163. Rule R114: River crossing structures - permitted activity | The submission point requests the acknowledgment of existing dams, clarification/permitted rule for temporary stream damming and diversion. Porirua City Council consider this request to be practicable given the potential necessity of damming and diversion for construction works. | Allow all of submission point S135/163: Allow for "The damming and diversion of water by a structure that was existing and lawful on the date of notification of this Plan as a Permitted Activity" or similar. Clarify that temporary stream damming and diversion required for in-stream structure works are included in all relevant rules for structures in a river bed, or provide for temporary damming and diversion as a permitted activity (subject to reasonable conditions). Allow all of submission point S146/175: |
| NZ Transport Agency Caroline Horrox PO Box 5084 Lambton Quay Wellington | S146/175 | Support | Support all of submission point S146/175. Rule R114: River crossing structures - permitted activity | The submission point requests small changes to facilitate the construction (in addition to the placement) of a river crossing structure. Also requests the | Amend Rule 114 The placement <u>or</u> construction <u>or</u> use of a river crossing structure, including, but not limited to, |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|-----------------|--|---|--|
| 6145 | | | | deletion of 'small' from 'small bridges'. Porirua City Council consider this request to be practicable. | weirs, fords and small bridges, excluding culverts and a river crossing that dams a river, that is fixed in, on, under, or over the bed of a river including any associated... |
| Egon Guttkie 6 Glengavel Grove Papakowhai Porirua 5024 | S14/38 | Support in part | Support the second part submission point S14/38. Rule R114: River crossing structures - permitted activity | The submission point requests a deletion to rule R114(f) OR, enable landowners to establish small river crossings. Porirua City Council consider it acceptable to allow, with a minimum of regulation, landowners to construct small or minor crossings across small depressions and hollows that may occasionally form a minor ephemeral flow path, and that are treated as rivers by GWRC. | Allow part of submission point S14/38: Enable landowners to establish small river crossings with a minimum of regulation in areas identified in (f)(i). |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council & Upper Hutt City Council C/- John Clemo PO Box 2083 Wellington 6140 | S85/42 | Support | Support submission point S85/42. Rule R114: River crossing structures - permitted activity | The submission point requests the plan clarifies that temporary stream damming and diversion required for instream structure works are included in all relevant rules for structures in a river bed, or provide for temporary damming and diversion as a permitted activity (subject to reasonable conditions). Porirua City Council consider this to be a reasonable request. | Allow submission point S85/42: Amend the plan to clarify that temporary stream damming and diversion required for in-stream structure works are included in all relevant rules for structures in a river bed, or provide for temporary damming and diversion as a permitted activity (subject to reasonable conditions). |
| New Zealand Defence Force C/- Rob Owen Private Bag 902 National Service Centre Cnr Alexander and Dante Roads Upper Hutt 5018 | S81/33 | Support | Support submission point S81/33. Rule R114: River crossing structures - permitted activity | This submission point requests clarification around 'small bridge' and provide for temporary structures in river beds. Porirua City Council consider this to be a practicable and reasonable request. | Allow submission point S81/33: Amend R114 to clarify how a "small bridge" is defined. Provide for temporary structures in river beds, for consistency with other regional plans across the country. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|---|
| <p>NZ Transport Authority Caroline Horrox PO Box 5084 Lambton Quay Wellington 6145</p> | S146/176 | Support | <p>Support submission point S146/176. Rule R115: Culverts - permitted activity</p> | <p>This submission point requests some changes to the wording of the rule to better support the construction and use of a culvert.</p> <p>Porirua City Council consider this to be a practicable and reasonable request.</p> | <p>Allow submission point S146/176:</p> <p>Amend Rule 115: The placement or construction and subsequent use of a culvert and associated protective structures, that is fixed in, or on, or under the bed of a river including any associated... (j) the culvert shall be positioned so that its alignment and gradient are generally the same as the river, and...</p> |
| <p>Roading, Parks and Gardens and Solid Waste departments of Hutt City Council & Upper Hutt City Council</p> <p>C/- John Clemo PO Box 2083 Wellington 6140</p> | S85/43 | Support | <p>Support submission point S85/43. Rule R115: Culverts - permitted activity</p> | <p>The submission point requests the plan clarify and provide for temporary damming and diversion as a permitted activity.</p> <p>Porirua City Council consider this request to be a practicable and reasonable request.</p> | <p>Allow submission point S85/43:</p> <p>Amend the plan to clarify that temporary stream damming and diversion required for in-stream structure works are included in all relevant rules for structures in a river bed, or provide for temporary damming and diversion as a permitted activity (subject to reasonable conditions).</p> |
| <p>Wellington Water Limited</p> <p>C/- Colin Crampton Private Bag 39804 Wellington Mail Centre Lower Hutt 5045</p> | S135/164 | Support | <p>Support submission point S135/164. Rule R116: Establishing a small dam and existing dams - permitted activity</p> | <p>This submission point requests that the plan recognise existing structures for damming and diverting water and provide for temporary damming and diversion of water.</p> <p>Porirua City Council consider this request to be a practicable and reasonable request.</p> | <p>Allow submission point: S135/164:</p> <p>Allow for "The damming and diversion of water by a structure that was existing and lawful on the date of notification of this Plan as a Permitted Activity" or similar.</p> <p>Clarify that temporary stream damming and diversion required for in-stream structure works are included in all relevant rules for structures in a river bed, or provide for temporary damming and diversion as a permitted activity (subject to reasonable conditions).</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|--|--|---|
| Fish and Game PO Box 1325 Palmerston North 4440 | S308/126 | Oppose | Oppose submission point S308/126. Rule R116: Establishing a small dam and existing dams - permitted activity | This submission point requests that this rule only applies to existing small dams and that new small dams should be discretionary. Porirua City Council consider this change to be overly restrictive. | Disallow submission point: S308/126: Amend rule so that it only applies to existing small dams. New small dams should be discretionary activity. |
| NZ Transport Agency Caroline Horrox PO Box 5084 Lambton Quay Wellington 6145 | S146/180 | Support | Support submission point S146/180: Rule R124: Entry or passage over bed (excluding livestock access) - permitted activity | This submission point acknowledges that disturbance and deposition occur when driving over the bed of a river, and that this rule should provide for this activity. Porirua City Council consider this request to be a practicable and reasonable request. | Allow submission point S146/180: Amend Rule 124 to be inclusive of other uses of rivers and lakes such as disturbance and deposition which cannot be avoided when driving over the bed. |

Further Submission on The Greater Wellington Natural Resources Plan Review.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (PNRP).

All sections of this form need to be completed for the submission to be accepted.

For information on making a further submission see the Ministry for the Environment website:

www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

By email: **regionalplan@gw.govt.nz**

Or Post:

Greater Wellington Regional Council

Further Submission on Proposed Natural Resources Plan

for the Wellington Region

Freepost 3156

PO Box 11646

Manners Street

Wellington 6142

DETAILS OF FURTHER SUBMITTER:

- * I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

“I enjoy the sport of surfing, and appreciate the benefits surfing brings to the Wellington Region.”

*** Name: Tom Del Campo**

Name of Organisation you represent:

***Address: 34 Lerwick Terrace Melrose 6022**

***Phone/ Fax 0211595781**

EMAIL ADDRESS: tomเดลcampo@gmail.com

- I do not wish to be heard in support of my further submission; or
- I do wish to be heard in support of my further submission; and, if so,
- I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Details of the submission(s) I am commenting on :

- **Submitter 282: Wellington International Airport Limited.**

Address for contact : Mitchell's Partnerships Ltd.
PO Box 489 Dunedin, 9054

Email **Claire.hunter@mitchellpartnerships.co.nz**

CC. **greg.thomas@wlg.aero**

I oppose submitter 282 in regard to the following points:

You wouldn't take away the only Rugby/Cricket Field in Wellington used by hundreds of people on a daily basis. Why would you consider doing that to us surfers. It is so crowded these days and you want to make it worse. Its down right dangerous to squish more people in smaller area to surf. I moved here to NZ for a job and to surf 10 years ago. It is now my home. Surfing was a huge draw to

come here. I am now in the process of becoming a proud citizen and hope that our voices are heard. This is a BIG deal to us rate paying surfers. Please don't destroy the wall our local sport and our sanity. Thank you.

WIAL Submission Page 5 Paragraph xi:

Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

Policy 15(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse

effects of activities on other natural features and natural landscapes in the coastal environment;

Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library: <https://natlib.govt.nz/records/23046068?search%5Bpath%5D=items&search%5Btext%5D=Llyall+Bay+1938>

“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

It should be pointed out that from case law the precedence is with respect to environmental impacts that they are assessed on, what is there today, not what it used to be like.

For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before the old structure was there, it is the impact on the existing environment.

In this case, it would mean that WIAL cannot argue that because the historic human-induced changes to Lyall Bay resulted in a high-quality surfing break, it does not have to consider it or that it has no value because it's not 'natural'. Furthermore, and most importantly, the reclamation may be manmade (i.e. not natural), however, the break that formed beside it formed naturally due to coastal processes and is an entirely natural feature in response to human intervention (it is comprised of swell, currents, water levels, seabed morphology and wind, as per Schedule 1 of the NZCPS).

Relief Sought:

Dismiss Wial's decision sought to remove Objective 037,

Dismiss Wial's decision sought to revise Schedule K of the PNRP with intent to remove the Corner surf break.

Dismiss Wial's decision sought to delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in

Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

(a) natural processes, currents, seabed morphology and swell corridors

that contribute to significant surf breaks, and

(b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

Policy 13 Preservation of natural character

2 (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

I note that other policies in the PNRP that relate to natural features (such as 4.6.5 Natural features and landscapes and special amenity landscapes (b))refer to avoid, remedy, or mitigate.

I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in

Schedule K (surf breaks) shall be managed by ~~minimising~~ **avoiding remedying, or mitigating** the adverse effects on:

(a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and

(b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Note:

The deletion I seek is indicated by strikethrough, the addition I seek is indicated by bold and underline

SIGNED:Tom Del Campo

*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

Please note:

All information included in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on the GWRC website and will include all personal details included in the further submission.

PLEASE CC THIS EMAIL TO WIAL, AN OBLIGATION OF THE FURTHER SUBMISSION PROCESS:

Claire.hunter@mitchellpartnerships.co.nz

or by Post:

Wellington International Airport Ltd
c/o Mitchell Partnerships Ltd

P.O. Box 489
Dunedin 9054

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

By email: regionalplan@gw.govt.nz

Name of submitter: Hammond Limited ("**Hammond**")

This is a Further Submission on: The Proposed Natural Resources Plan for the Wellington Region ("**proposed NRP**") pursuant to clause 8 of Schedule 1, Resource Management Act 1991.

This further submission is in support of a submission to the proposed NRP. Hammond is a person who has an interest in the proposed NRP that is greater than the interest the general public has. As explained in Hammond's original submission:

1. Hammond owns a farm property in Greytown and the Papawai and Whakapototo Streams run through the property.
2. Hammond holds consent to take and use water from bores which are connected to the Papawai Stream. Hammond is in the process of obtaining consent to authorise stream clearance activities.
3. Hammond agrees to receive communication about the proposed NRP via email, addressed to: stephenmareehammond@gmail.com; stephen.christensen@andersonlloyd.co.nz
4. Hammond could not gain an advantage in trade competition through this submission.
5. Hammond provided a submission on the proposed NRP.
6. Hammond appreciates having this opportunity to further submit on the proposed NRP. Below is Hammond's submission point.
7. Hammond wishes to be heard in support of this submission. If others make a similar submission Hammond will consider presenting a joint case with them at a hearing.

This is a further submission in relation to the Greater Wellington Regional Council submission (Submission point number S133/022) on provision 7 Ruamahanga Whaitua, Table 7.3 (Decisions Requested: Rule R.R1 – this is a mistake). Hammond **supports** this submission. The decision sought from Council is to allow the submission. See the reasoning set out below:

| Summary of Decision Requested | Reasons for support or opposition |
|---|--|
| <p><i>Amend Row 14 to read: Ruamāhanga River and tributaries upstream of the confluence with the Papawai Stream, category A groundwater and category B groundwater (directly connected), excluding all the above catchment management sub-units in the Ruamāhanga catchment (above this row in Table 7.3)</i></p> <p><i>Amend Row 17 to read: Lower Ruamāhanga River and tributaries upstream of (but not including) the confluence with the Lake Wairarapa outflow; category A groundwater and category B groundwater (directly connected), and excluding all the above catchment management sub-units in the Ruamāhanga catchment (above this row in Table 7.3)</i></p> | <p>Hammond made a submission on Row 13 of Table 7.3 opposing the proposed allocation limit.</p> <p>Hammond is uncertain at this stage if the Council's submission on Row 14 affects its water take authorised by water permit number WAR080557.</p> <p>If Hammond's consent to take water falls under Row 14, Hammond supports the Council's submission.</p> <p>Regardless of whether Hammond's water take falls under Row 13 or Row 14, Hammond maintains its position in its original submission opposing the allocation limit in Row 13 of Table 7.3.</p> |

Date: 24 March 2016



Hammond Limited

By its solicitors and duly authorised agents
ANDERSON LLOYD
Per: Stephen Christensen

Address for service of submitter:

c/- Anderson Lloyd
Private Bag 1959
Dunedin 9054

Attention: Stephen Christensen

Telephone: 03 477 3973
Fax: 03 477 3184
Email: stephen.christensen@andersonlloyd.co.nz

Submitter ID:

File No:



greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

Further Submission

on Proposed Natural Resources Plan
for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

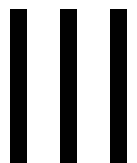
Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

SUSAN SOUTHEY

ORGANISATION (* the organisation that this submission is made on behalf of)

Masterton District Council

ADDRESS FOR SERVICE

Boffa Miskell Ltd

POSTCODE

6142

PO Box 11340 Wellington

PHONE

049014290

FAX

EMAIL

pauline.w@boffamiskell.co.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
- I am a person who has an interest in the PNRP that is greater than the interest the general public has.

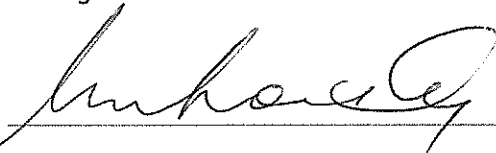
Specify below the grounds for saying that you are within the category you have ticked.

Masterton District Council is a local authority for the relevant area subject to the PNRP.

Service of your further submission

Please note that you must serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature: 

Date: 24 March 2016

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
- I do wish to be heard in support of my further submission; and, if so,
- I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|--|--------------|---|-----------------|
| Entire Plan / General | | | | | |
| Wellington Water Limited | S135/216 | Entire Plan Re-balance to reduce the amount of regulation and increase the use of 'Other Methods' to enable more collaboration and sharing of risks between GWRC and councils, applicants and the community. | Support | MDC is supportive of the approach to use other methods to achieve the desired outcomes and on this basis is supportive of the submission point. | Allow the point |
| Wellington Water Limited | S135/215 | Entire Plan A section 32A analysis (required with the decisions on this proposed plan) that gives effect to the requirements for a cost-benefit analysis with consideration of efficiency and effectiveness be provided. | Support | As outlined in MDC's original submission (refer <i>General Relief Sought</i> bullet point 3), MDC supports a full review of the Section 32 reports, in particular the costs associated with the proposed regulatory framework. Given the significant regulatory interventions proposed under the PNRP, a section 32A report that provides a more comprehensive cost benefit analysis is required. | Allow the point |
| Hutt City Council | S84/001 | Entire Plan Reconsider the use of the term 'avoid' and ensure that it does not unnecessarily and inappropriately constrain activities that result in effects that are significant and/or provide essential services for the health and safety of the community and protection of the environment. HCC does not rule out the use of a non-complying activity status in limited cases. | Support | While MDC does not oppose the use of the term 'avoid', it is concerned where the term is used for those activities which do not have significant effects or for those activities which are necessary for the functioning and wellbeing of the community, such as regionally significant infrastructure. In relation to non-complying activity status, as outlined in MDC's original submission (page 11, bullet point 6) the plan should provide a regulatory framework for regionally significant infrastructure and local authority roading which is based on controlled, restricted discretionary or discretionary status, not a default to non-complying. A non-complying activity status for such activities is unnecessarily restrictive and has significant costs implications. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/001 | Entire Plan Reconsider the use of the term 'avoid' wherever used in the PNRP and ensure that it does not unnecessarily and inappropriately constrain activities that result in effects that are not significant and/or provide essential services for the health and safety of the community and protection of the environment. For example, consider qualifying it by avoiding "significant adverse effects" (Policy P53) rather than avoiding all effects. | Support | While MDC does not oppose the use of the term 'avoid', it is concerned where the term is used for those activities which do not have significant effects or for those activities which are necessary, such as regionally significant infrastructure. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|-----------------|---|-----------------|
| Wellington Water Limited | S135/208 | Schedule N: Stormwater management strategy Schedule N should be restructured to take a risk management approach that aligns with the asset management systems used to manage the stormwater networks. Wellington Water is in the process of developing such an alternative schedule and we are keen to work with GWRC to finalise it. The schedule should exclude elements of asset management and focus on providing limits and outcomes to be met. It should only include elements that network managers have in their control. | Support in Part | Should Schedule N not be deleted as sought in MDC's original submission, MDC supports restructuring of the schedule. | |
| South Wairarapa District Council | S366/133 | 13 Maps Oppose That all maps be deleted, revised for scale and accuracy and renotified for consideration | Support | As outlined in MDC's original submission (refer General Relief Sought bullet point 9), MDC supports a full review of the maps and reliance on the GIS system. Given the implications of the maps, plan users need to be assured of their accuracy and certainty. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/062 | 12 Schedules Amend Review the extent of scheduled sites to ensure their accuracy. Revise all rules relating to scheduled sites to ensure they apply only when the feature to be protected is affected. Insert Schedule F5, or remove reference to it in the PNRP. | Support | As outlined in MDC's original submission (refer General Relief Sought bullet point 5)) MDC supports a full review of the schedules and the process by which sites were included. Given the implications of the schedules, plan users need to be assured of their accuracy and certainty and the appropriateness of the application of corresponding rules. | Allow the point |
| Mt Victoria Residents' Association Inc (MVRA) | S162/002 | Entire Plan Not stated The Proposed Plan does not reflect all elements of the Regional Policy Statement, and does not meet its integrated planning requirements. | Support | As outlined in MDC's original submission (refer General Relief Sought bullet point 4), MDC supports a full review of the policy framework against the policy framework of the RPS to ensure consistency. On this basis the submission point is supported. | Allow the point |
| 1. Introduction | | | | | |
| Porirua City Council | S163/003 | 1.4 Integrated catchment management [Concerns regarding introducing the whitua provisions as plan changes and the implications for consenting requirements; decision requested not stated]. | Support | As outlined in MDC's original submission, MDC is concerned how any Plan Change emanating from the Whitua process will change other parts of the plan, and the relationship between the outcomes of the process and operative standards. Such changes may create a need for review of provisions already fully considered through this plan development process. As sought in MDC's original submission (<i>General Relief Sought</i> bullet point 10,) MDC seek inclusion of the outcomes of the Ruamahanga Whitua process prior to submissions being heard. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|--------------|--|-----------------|
| NZ Transport Agency | S146/003 | 1.4 Integrated catchment management Provide a mechanism for industry representation, including infrastructure providers, to be involved in the whitua committees, especially in the context of regulatory mechanisms. Address concerns that the whitua committees may generate inconsistent provisions within the PNRP. | Support | Given the potential for significant changes to the NRP as a result of the whitua process, MDC supports the inclusion of interested and affected parties in the development process. While parties will be able to input into any formal plan change process arising from the whitua process, it would seem more efficient to have parties involved in the development of the provisions, particularly given the relationship and impact on other provisions in the NRP are unclear. | Allow the point |
| Point Howard Association Inc | S403/002 | 1.4 Integrated catchment management The proposed plan should lay down what opportunities exist for general public input to be provided prior to decisions being finalised for the Whitua prepared plans. Submitter is assuming that the final sign-off on any decision affecting our natural resources will be at a meeting of the relevant committee of the GWRC and that opportunity for input from members of the public will be provided. | Support | Given the potential for significant changes to the NRP as a result of the whitua process, MDC supports the inclusion of interested and affected parties in the development process. While parties will be able to input into any formal plan change process arising from the whitua process, it would seem more efficient to have parties involved in the development of the provisions, particularly given the relationship and impact on other provisions in the NRP are unclear. | Allow the point |
| Kapiti Coast District Council | S117/001 | 1.5.1 Statutory framework Insert a new paragraph under paragraph 2 page 9 <i>"District Plans are regulatory, and restrict use of land that would otherwise be unregulated. District Plans, like Regional Plans, must give effect to national and regional policy statements. Activities can span jurisdictional boundaries, and trigger requirements under both regional and district plans"</i> | Support | The recognition of cross boundary issues is supported, and MDC supports the introductory statement. | Allow the point |
| Kapiti Coast District Council | S117/002 | 1.5.2 Community views, scientific and technical information - identifying issues Insert a new paragraph 1.5.3 <i>"Role of territorial authorities"</i> as follows: <i>"Many issues in the region are shared with the territorial authorities. The territorial authorities can have roles as joint promoters, for example through supporting initiatives through funds and other incentives, as service providers managing activities such as stormwater and wastewater that have positive environmental outcomes, as regulators in common for activities that span boundaries (such as vegetation in wetlands) or affect both regional and district functions (such as earthworks), and as joint implementers of matters such as issuing consents, monitoring, and enforcement. To achieve the best outcomes for communities therefore the different agencies need to work together."</i> | Support | MDC supports the statement as it highlights the need for a collaborative and integrated approach. | Allow the point |
| 2. Interpretation | | | | | |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|----------------|---|----------------------------|
| NZ Transport Agency | S146/007 | Add new definition which aligns with the RMA: Section 2 Interpretation definition of the term: <u>Best practicable option</u> means the best site, route or method for preventing or minimising the adverse effects on the environment having regard, among other things, to-- (a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and (b) the financial implications, and the effects on the environment, of that option when compared with other options; and (c) the current state of technical knowledge and the likelihood that the option can be successfully applied | Support | Consistent with MDC's original submission point S367/012, MDC supports the inclusion of a definition, noting that the term only appears to be used in Policy 150 relating to noise and lighting. | Allow the point |
| Federated Farmers of New Zealand | S352/045 | Sensitive area Amend For the purpose of rules xx, A sensitive area <u>includes the following</u> means: • Dwelling house • Educational facilities • Amenity areas and public places • Group drinking water supplies and community drinking water supply protection areas • Surface water bodies and associated riparian vegetation • Non-target plants, crops, which are sensitive to agrichemicals • Organically certified properties, e.g., Bio-Gro • Natural wetlands, outstanding waterbodies, and ecosystems with significant values listed in Schedule F | Oppose in part | The term Sensitive Area is used within Rule 15 Spray coating not within an enclosed space, and Rule 36 Agrichemicals. MDC opposes the deletion of reference to 'Group drinking water supplies and community drinking water supply protection areas' given the potential effects of such activities on these areas. | Disallow the point in part |
| Wellington Water Limited | S135/030 | Unused water Change the definition to specifically exclude community drinking water suppliers. Alternatively, provide a separate definition for a community drinking water supply to the effect of requiring justification of unused water by way of a risk management framework. | Support | The term 'unused water' is used within Policy 119 (relating to re-allocation of unused water). MDC supports the exclusion of community drinking water suppliers from the definition given the associated human health needs. | Allow the point |
| Kaiwaiwai Dairies Limited | S119/047 | Category 2 surface water body If water races included in definition then only include those wider than 1 metre. | Oppose | In MDC's original submission (S367/018) MDC sought references to drains and water races be deleted given they are generally artificial and have specific functional requirements. The function does not change depending on the width of the water race and on this basis the 1m width provision is opposed. | Disallow the point |
| Porirua City Council | S163/030 | Regionally significant infrastructure Amend definition to include municipal landfills. Amend definition to clarify what strategic telecommunications and radio communications facilities are. | Support | MDC supports the inclusion of municipal landfills given the regional role and importance of such activities. However this support relates to operating/open landfills and not closed landfills. | Allow the point |
| Wellington Water Limited | S135/026 | Regionally significant infrastructure Replace the sixth bullet point with " <u>the local authority water supply network, water treatment plants and intake works</u> " or similar. | Support | MDC supports the additional wording as it clarifies that intake works are included, which are an integral part of water supply facilities. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|-----------------------------|---|--------------------|
| Wellington City Council | S286/014 | Regionally significant infrastructure Amend the definition of Regionally Significant Infrastructure to include all roads; or Ensure that the objectives and policies recognise and provide for the local roading network, in a similar way as they provide for Regionally Significant Infrastructure. | Support | Consistent with MDC's original submission point S367/019, MDC supports the inclusion of all roads within the definition or, if this relief is not accepted, that roads are provided for in the objectives and policies. Given the importance of the overall road network to the functioning of the region, it is appropriate they are recognised and provided for. | Allow the point |
| 3. Objectives | | | | | |
| Atiawa ki Whakarongotai | S398/005 | 3. Objectives Support Objectives in sections 3.1, 3.6, 3.7 are critical. Objectives in sections 3.10, 3.13, 3.16, 3.17 are supported. Objectives that refer to mahinga kai are crucial to role of kaitiaki. | Neutral | MDC is not in principal opposed to the term mahinga kai, but seeks that it be used where appropriate in context of the objective. | Neutral |
| Atiawa ki Whakarongotai | S398/007 | 3. Objectives Amend Where practical the Plan should indicate timeframes within which objectives will be delivered | Oppose | Without the benefit of being able to comment on specific timeframes, MDC opposes the imposition of timeframes on the basis such provisions would have significant implications for regionally significant infrastructure. | Disallow the point |
| Carterton District Council | S301/024 | 3. Objectives Amend Objectives O5, O16, O17, O23, O25, O26, O27, O33, O35 and O50 and the accompanying explanatory text to acknowledge the need to allow time (longer than the 10-year life of the Natural Resources Plan) for communities to remove their discharges of treated wastewater from surface water and to provide for the continued discharge of treated wastewater to water in specific circumstances (subject to discretionary activity consent). | Support | The clarification sought by Carterton District Council is supported as while MDC is committed to improving water quality, sufficient time is required to achieve the outcomes sought. It must also be recognised that in some circumstances the discharge of treated wastewater to surface water will be necessary. | Allow the point |
| Rangitane o Wairarapa Inc | S279/063 | 3. Objectives Amend Add new objective which sets out outcomes associated with taking, using, damming and diversion of water, including: The taking, use, damming and diversion of fresh water is managed to: a) avoid the transfer of water between water bodies that are not within the same catchment or between catchments. b) Protect the Mauri of rivers, lakes, wetlands, groundwater and other natural resources, c) Recognise and provide for the relationship of Maori, and their culture and traditions, with land, water, waahi tapu, sites of significance and other taonga, d) Avoid adverse effects on Nga Taonga Nui a Kiwa and Outstanding natural landscapes and features (including Outstanding water bodies) e) Safeguard ecosystem health and mahinga kai. | Oppose (as already in plan) | While MDC does not specifically oppose the outcomes sought, a specific objective is not considered necessary as the matters are adequately covered elsewhere in the objective and policy framework. | Disallow the point |
| Rangitane o Wairarapa Inc | S279/012 | Objective O2: Importance of land and water Amend Amend as follows; <i>The importance and contribution of land and water, and ecological systems and processes, to the social, economic and cultural well-being, and the health of people and the community are recognised.</i> | Oppose (as already in plan) | While MDC does not specifically oppose the amendment contents, the changes are not supported as ecological systems are managed under Section 3.6 of the PNRP. | Disallow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|--|----------------|--|----------------------------|
| Land Matters LTD | S285/021 | Objective O5: Fresh and coastal water Amend <i>Fresh water bodies and the coastal marine area, as a minimum, are managed to: (a) safeguard aquatic ecosystem health and mahinga kai; (b) provide for contact recreation secondary recreational contact and/or provision of potable water and Maori customary use, and (c) in the case of fresh water, provide for the health needs of people secondary recreational contact and/or provision of potable water.</i> Add a new definition for 'secondary recreational contact'. | Oppose | In MDC's original submission (S367/035), MDC supported the retention of clause c). The amendment to the clause as sought by S285/021 is opposed on the basis the health needs of people is wider than just recreational contact and potable water. | Disallow the point |
| Federated Farmers of New Zealand | S352/056 | Objective O5: Fresh and coastal water Amend as follows or to similar effect: " <i>freshwater bodies and the coastal marine area, as a minimum, are managed to a) safeguard aquatic ecosystem health and mahinga kai; and b) provide for contact recreation and maori customary use; and c) provide for the health needs of people provide an appropriate balance across values and uses in a catchment.</i> " | Oppose in part | The amendments sought are opposed in part as the resulting objective is vague and lacks specific direction. The outcomes sought within the objective require clarification. | Disallow the point in part |
| Fish and Game | S308/016 | Objective O7: Water for livestock Amend objective O7 to ensure that provision of water for livestock is not contrary to s14(3)(b) and that it does not cause significant adverse effects on aquatic life and occurs within water quantity limits | Oppose | Section 3.2 and the corresponding objectives relate to 'Beneficial use and development'. Matters relating to water allocation and ecological systems are better addressed under other objectives and on this basis the submission point is opposed. | Disallow the point |
| Royal Forest and Bird Protection Society | S353/017 | Objective O8: Allocation regime Oppose Delete | Oppose | As outlined in MDC's original submission point S367/038, the retention of objective 8 is supported as the social and economic benefits of taking and using water are appropriately recognised within the objective as well as other values, such as environmental and cultural values. On this basis the deletion of the objective is opposed. | Disallow the point |
| CentrePort Limited (CentrePort) | S121/023 | Objective O11: Maori customary use Amend Objective O11 as follows: <i>Opportunities for Māori customary use of the coastal marine area, rivers and lakes and their margins and natural wetlands for cultural purposes are recognised, maintained and improved where appropriate.</i> | Support | Should the relief in MDC's original submission point S367/039 not be accepted, MDC supports the relief sought by CentrePort Ltd as the additional words recognise opportunities are likely to be vary depending on the circumstances of the use and site. | Allow the point |
| Rangitane o Wairarapa Inc | S279/022 | Objective O11: Maori customary use Amend the objective to ensure: Māori customary use is replaced with appropriate reference to the full extent of the relationship of Māori and their culture and traditions with fresh and coastal water bodies; The ongoing and enduring relationships of tangata whenua over their lands, water, and other resources and sites are appropriately recognised and provided for; and Tangata whenua have the ability to exercise kaitiakitanga over waters, lands and fisheries in the coastal environment. | Oppose in part | For the reasons outlined in MDC original submission point S367/039 ¹ , the relief sought in point S279/022 is opposed in part in terms of the lack of a definition of Maori customary use. MDC seeks a definition to provide certainty and assist in plan interpretation and application. | Disallow the point in part |

¹ The submission point sought the deletion of objective O11 or defining "Māori customary use" to provide certainty as to the implications of the definition.

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|--|-----------------|--|-------------------------|
| Chorus New Zealand Limited | S144/005 | <p>Objective O12: Benefits of regionally significant infrastructure</p> <p>Amend Objective O12 as follows:</p> <p><i>Objective O12(Coastal) The social, economic, cultural, and environmental <u>and health and safety</u> benefits of regionally significant infrastructure and renewable electricity generation activities.</i></p> <p><u>Objective O12A Recognise that some regionally significant infrastructure has a functional need and/or operational requirement to be located and/or operated in a particular environment.</u></p> | Support | In addition to the relief sought in MDC's original submission point S367/040, MDC supports the amendments by Chorus as it provides greater recognition of functional and operational requirements. | Allow the point |
| Vector Gas Ltd | S145/015 | <p>Objective O13: Protecting regionally significant infrastructure</p> <p>Amend</p> <p><i>The use and ongoing operation of regionally significant infrastructure and renewable energy generation activities in the coastal marine area are protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.</i></p> | Support | MDC supports the amendments sought by Vector Gas Ltd as the removal of reference to the coastal marine area makes it clear the objective should apply to all areas and not just the coastal marine area. This amendment was sought in the reasoning in MDC's submission point S367/041 (but not shown as strikethrough text). | Allow the point |
| Fish and Game | S308/018 | <p>Objective O17 (and O19 and O22): Natural character</p> <p>Amend section 3.4 and objectives O17, O19, and O22 to: <u>Recognise and preserve aquatic habitat diversity and quality, including the form, frequency and pattern of pools, runs, and riffles in rivers, and the natural form of rivers, lakes, natural wetlands and coastal habitats. Recognise and preserve freshwater habitats that are important to the life cycle and survival of aquatic species Avoid effects of land use activities and activities on the margins of freshwater bodies and their beds at times which will affect the breeding, spawning, and dispersal or migration of aquatic species avoid activities and the placement of structures in the bed of freshwater environments which would create barriers to the migration or movement of indigenous aquatic species restore natural character including the connections between fragmented aquatic habitats where degraded</u></p> <p>Specifically require that flood protection and river management activities are undertaken in a manner which recognises and protects the natural character of freshwater and enhances natural character where degraded such that the provisions listed above are achieved and the natural character narrative and index in Table 3.4 Appendix 3 to this submission is met.</p> | Oppose | <p>MDC opposes the resulting change in emphasis proposed by the amendments.</p> <p>The sought approach has the potential ability to limit flood protection activities which are of regional and district importance.</p> | Disallow the point |
| Wellington International Airport Limited | S282/011 | <p>Objective O19: Natural processes</p> <p>Delete Objective O19 entirely or amend as follows: The interference from <u>Any adverse effects of use and development on natural processes is are avoided, remedied or mitigated minimised.</u></p> | Support in part | <p>The submission point is supported in part in that MDC supports the proposed wording amendments as they reduce the subjective nature of the notified wording.</p> <p>While in its submission MDC did not directly oppose the use of the term 'minimised' or its interpretation as provided in Policy 4, it is unclear how the term "minimised" works in context of a generic objective such as Objective 19.</p> | Allow the point in part |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|----------------|--|----------------------------|
| Chorus New Zealand Limited | S144/007 | Objective O21: High hazard areas Amend Objective O21 as follows: <i>Inappropriate use and development in high hazard areas is avoided, other than (a) where it has a functional need and/or operational requirement to be located there, and/or (b) where it is necessary to enable the efficient operation of regionally significant infrastructure.</i> | Support | As noted by Chorus, given the emphasis on avoid within the objective, the suggested amendment would assist in determining whether the use and development is "inappropriate". Such an amendment would assist with plan interpretation and application of the objective. | Allow the point |
| Fish and Game | S308/031 | Objective O31: Outstanding water bodies Amend the objective, policies and rules to ensure that outstanding waterbodies are identified based on a full assessment of their values. Set out the criteria for identifying outstanding waterbodies. <i>Outstanding fresh water bodies and their margins are identified and included in Schedule A, and are protected or if degraded are restored to protect and enhance their values</i> | Oppose in part | MDC is not opposed to the identification of outstanding water bodies (as sought in MDC's original submission point S367/051 in that certainty be provided as to the extent and location of scheduled items). However in relation to the specific wording of Objective O31, MDC seeks the wording proposed in its submission (S367/051) which refers to inappropriate use and development be used. The words protect and enhance do not align with the RMA. | Disallow the point in part |
| Wellington International Airport Limited | S282/019 | Objective O44: Land use impacts on soil and water Amend Objective O44 as follows: <i>The adverse effects on soil and water from land use activities are minimised avoided, remedied or mitigated.</i> | Support | MDC supports the amended wording as it would provide greater certainty and improve efficiency. While in its submission MDC did not directly oppose the use of the term 'minimised' or its interpretation as provided in Policy 4, it is unclear how the term "minimised" works in context of a generic objective such as Objective 44. | Allow the point |
| Porirua Harbour and Catchment Community Trust | S33/006 | Objective O50: Wastewater discharges to fresh water Amend Change "reduced" to "eliminated". | Oppose | MDC opposes the word replacement as it is not always practicable or possible to 'eliminate' all discharges of wastewater to fresh water. As such the absolute nature of the term is opposed. | Disallow the point |
| Rangitane o Wairarapa Inc | S279/060 | Objective O50: Wastewater discharges to fresh water Amend as: <i>New or increases in existing discharges of wastewater to fresh water are not allowed and existing discharges of wastewater to fresh water are progressively reduced so that they are fully phased out by no later than 2030.</i> | Oppose | MDC opposes the wording sought as it is important to recognise there are operational, practical and financial constraints to small communities to eliminate discharges in a 14 year timeframe; and the outcome of the relief sought has affordability issues for local authorities and their communities. | Disallow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|-----------------|--|-------------------------|
| Atiawa ki Whakarongotai | S398/013 | Objective O50: Wastewater discharges to fresh water Oppose Discharge of human effluent to water should be prohibited. The objective should include a timeframe for the reduction of discharges. | Support in part | MDC supports the relief sought in relation to the discharge of <u>untreated</u> human effluent as it agrees the discharge of untreated effluent to water is inappropriate. | Allow the point in part |
| Royal Forest and Bird Protection Society | S353/045 | Objective O53: Functional need in the coastal marine area Oppose Replace reference to coastal marine area with coastal environment. Add the following at the end of the objective: <u>and avoids adverse effects on significant indigenous vegetation and significant habitat of indigenous fauna and outstanding landscapes and features in the coastal environment.</u> | Oppose | Objective O53 relates to the functional need or operational requirements within the coastal marine area. Effects on significant vegetation, habitats and outstanding areas are comprehensively addressed in other objectives of the PNRP and are not appropriate in context of the proposed Objective 53. | Disallow the point |
| 4. Policies | | | | | |
| NZ Transport Agency | S146/078 | 4. Policies Add a new policy to provide direction on the duration of operational consents for infrastructure of regional significance. Resource consent durations for regionally significant infrastructure applications required under ss13, 14 and 15 of the RMA will generally be granted for the maximum period of time unless reasons are identified during the consent process that make this inappropriate. | Support | Given the role and importance of regionally significant infrastructure, and the significant costs in obtaining resource consent, direction on the maximum term for consents is supported. | Allow the point |
| Wellington City Council | S286/006 | 4. Policies Remove the use of 'avoid' in the policies. | Support | While MDC is not opposed to the use of the term "avoid" in all the policies, such terminology needs to be balanced with the actual effects of an activity, and the role and importance of some activities such as regionally significant infrastructure. | Allow the point |
| Wellington City Council | S286/030 | 4. Policies Amend Policies 33, 40 and 41 or include new policies that address the issue of where there may be significant adverse effects as a result of essential works for the maintenance of infrastructure assets (including roads). | Support | The submission point for recognising infrastructure is supported given the essential nature of such works, and their role and importance. | Allow the point |
| CentrePort Properties Limited | S141/020 | Policy P4: Minimising adverse effects Amend: <i>Where minimisation of adverse effects is required by policies in the Plan, minimisation means reducing adverse effects of the activity to the greatest extent reasonably practicable and shall may include:...(b) where reasonably practicable, locating the activity away from areas identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule E (historic heritage), Schedule F (indigenous biodiversity), and... (e) designing the activity so that the scale or footprint of the activity is as small as practicable, where it is reasonably practicable to minimise adverse effects on identified areas.</i> | Support | The amendments are supported as they recognise the benefits of an activity, which is particularly relevant in relation to regionally significant infrastructure. The replacement of the word 'shall' with 'may' is particularly supported as it makes it clear that not all the matters/criteria will be relevant in considering the minimisation of adverse effects. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|--|--------------|---|--------------------|
| Minister of Conservation | S75/078 | Policy P4: Minimising adverse effects Amend as follows: <i>(a) avoiding adverse effects of activities on <u>the characteristics and qualities that contribute to the values of outstanding natural features and landscapes, and</u>(b) avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on <u>the characteristics and qualities that contribute to the values of other natural features and landscapes.</u></i> | Support | The submission point is supported as the amendments direct the focus and consideration to the values within the area that are to be considered. | Allow the point |
| Fish and Game | S308/043 | Policy P4: Minimising adverse effects Oppose Delete and replace with a new policy that ensures that: • sustainable management is achieved • adverse effects are avoided, remedied, and mitigated, and that • significant adverse effects are avoided, and that • the outcomes from the policy are clear; and that • application of the policy is consistent with achieving the freshwater outcomes set in section 3 tables • Avoid adverse effects outstanding habitats; • Avoid adverse effects on natural wetlands • Avoid adverse effects on riparian vegetation • Avoid adverse effects on natural character • Avoid adverse effects on ecosystems and habitats with significant biodiversity values • Avoid adverse effects on fish spawning and juvenile rearing habitats and fish migration. | Oppose | In MDC's original submission on Policy P4 MDC largely supported the policy subject to amendments. The relief sought by Fish and Game to re-write the policy with a focus on avoidance is opposed as the proposed matters are addressed elsewhere in the plan and the proposed intent fails to reflect the intent of the policy. | Disallow the point |
| CT and EM Brown | S13/003 | Policy P7: Uses of land and water Identify and recognise stormwater channels in the NRP. Provide for their maintenance by Councils and land owners by making this a permitted activity in the NRP. | Support | As outlined in MDC's original submission, MDC supports the maintenance of storm water channels as a permitted activity. | Allow the point |
| Kiwi Rail Holdings Limited | S140/030 | Policy P7: Uses of land and water Amend Policy P7 to add: (l) regionally significant infrastructure. | Support | The inclusion of reference to regionally significant infrastructure is supported as such activities have clear social and economic benefits and are appropriately included within the policy. | Allow the point |
| Royal Forest and Bird Protection Society | S353/057 | Policy P8: Beneficial activities Delete (h) | Oppose | The recognition of the benefits and appropriateness of the maintenance and use of existing structures is supported as such structures are often related to regionally significant infrastructure and have an operational or locational requirement for their functioning. Given the structures are existing, their ongoing use and maintenance is beneficial and more economical and on this basis is supported. Deletion of (h) is therefore opposed. | Disallow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|-----------------|---|-------------------------|
| NZ Transport Agency | S146/083 | <p>Policy P13: Existing regionally significant infrastructure and renewable electricity generation facilities</p> <p>Amend Policy 13: <i>The use, operation, maintenance, and upgrade and development of existing regionally significant infrastructure and renewable energy generation activities are beneficial and generally appropriate.</i></p> <p>Or Retain Policy 13 (i.e. excluding 'development') and add a new policy to enable new development: <u><i>The development of new regionally significant infrastructure and renewable energy generation activities to meet the needs of the community are beneficial and are generally appropriate.</i></u></p> | Support | The recognition of the development of regionally significant infrastructure is supported given the importance and benefits of the infrastructure. | Allow the point |
| Rangitane o Wairarapa Inc | S279/080 | <p>Policy P13: Existing regionally significant infrastructure and renewable electricity generation facilities</p> <p>Amend to state where the benefit is accrued and to be clear that adverse effects of the operation, use, maintenance and upgrade can still have adverse effects on the environment and need to be managed. Add in a new policy to ensure that new, or increases in scale or extent of existing, regionally significant infrastructure and renewable energy generation facilities shall avoid causing adverse effects on sites in Schedules A to F, H and J.</p> | Oppose | Policy 13 solely relates to the recognition of the benefits and appropriateness of regionally significant infrastructure and renewable electricity generation facilities. The issues of adverse effects and avoidance on scheduled sites are adequately addressed in other policies within the plan. The use of avoidance is also an absolute term with no context provided as to the scale of the adverse effects. | Disallow the point |
| Rangitane o Wairarapa Inc | S279/081 | <p>Policy P14: Incompatible activities adjacent to regionally significant infrastructure and renewable electricity generation activities</p> <p>Amend to state where the benefit is accrued and to be clear that adverse effects of the operation, use, maintenance and upgrade can still have adverse effects on the environment and need to be managed. Add in a new policy to ensure that new, or increases in scale or extent of existing, regionally significant infrastructure and renewable energy generation facilities shall avoid causing adverse effects on sites in Schedules A to F, H and J.</p> | Oppose | The issues of adverse effects and avoidance on scheduled sites are adequately addressed in other policies within the plan. The use of avoidance is also an absolute term with no context provided as to the scale of the adverse effects. On this basis the submission point is opposed. | Disallow the point |
| Rangitane o Wairarapa Inc | S279/082 | <p>Policy P17: Mauri</p> <p><i>The mauri of fresh and coastal waters shall be recognised as being important to Maori and sustained and enhanced by:</i></p> <p><i>(a) managing avoiding remedying or mitigating the individual and cumulative adverse effects of activities that may impact on mauri in the manner set out in the rest of the Plan including by not allowing activities that will have significant adverse effects on the quality and quantity of fresh and coastal water and their associated ecosystems, and (b) providing for activities that sustain and enhance mauri, and (c) recognising and providing for the role of kaitiaki in sustaining mauri, including by enabling participation of kaitiaki as affected parties in resource consent processes involving discharges to water or discharges to land that may enter water, and activities affecting Sites of Significance to Mana Whenua, water bodies with outstanding cultural and spiritual values and Nga Taonga Nui a Kiwi (sic).</i></p> | Support in part | MDC supports the mauri of fresh and coastal waters being recognised as of importance to Maori. However, MDC does not support the blanket requirement for kaitiaki as affected parties in resource consent processes. The issue of notification depends on the specific circumstances of an activity, including the values of a particular waterbody, and each consent should be considered on its merits. Not every consent is relevant to iwi. | Allow the point in part |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|--------------|---|--------------------|
| NZ Transport Agency | S146/089 | Policy P24: Outstanding natural character Amend Policy 24 Areas of outstanding natural character in the coastal marine area will be preserved by: (a) Protecting avoiding adverse effects of activities on natural character in areas of the coastal marine area with outstanding natural character by avoiding inappropriate use and development, and (b) requiring use and development to be of a type, scale and intensity that will maintain the natural character values of the area, and (c) requiring built elements to be subservient to the dominance of the characteristics and qualities that make up the natural character values of the area, and (d) maintaining the high levels of naturalness of these areas, and (e) avoiding the adverse effects of activities, including those located outside the area, that individually or cumulatively detract from the natural character values of the outstanding natural character area. | Support | The amendments sought are supported as they appropriately recognise that it is not all adverse effects which are to be avoided, rather inappropriate use and development. The deletion of clause c) is supported as the policy control should not extend to activities outside the outstanding natural character areas as it is unclear and uncertain where such areas are and how they are identified. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/031 | Policy P27: High hazard areas Amend the definition of high hazard areas so that it is based on an appropriate assessment of actual hazard, rather than inappropriately capturing all river and lake beds AND modify the policy framework to be less absolute in terms of restrictions | Support | Notwithstanding the relief sought in MDC's original submission, MDC supports the redefining of what constitutes a high hazard area, and a less absolute policy framework. | Allow the point |
| Atiawa ki Whakarongotai | S398/019 | Policy P31: Aquatic ecosystem health and mahinga kai Amend wording for points (a)-(d) and (f)....."avoiding adverse effects" instead of "minimising adverse effects" | Oppose | The absolute nature of the term "avoid" is opposed in that the wording change sets an unnecessarily high bar with the policy direction to 'avoid' the adverse effects regardless of their scale or significance. | Disallow the point |
| Wellington International Airport Limited | S282/038 | Policy P32: Adverse effects on aquatic ecosystem health and mahinga kai Amend Policy P32 as follows: <i>Significant adverse effects on aquatic ecosystem health and mahinga kai shall be managed by:</i> a) <i>Avoiding significant adverse effects, and</i> b) <i>Where significant adverse effects cannot be avoided, remedying them, and</i> c) <i>Where significant adverse effects cannot be remedied, mitigating them, and</i> d) <i>Where <u>significant</u> residual adverse effects remain, <u>considering</u> the use of biodiversity offsets. Proposals for mitigation and biodiversity offsetting will be assessed against the principles listed in Schedule G (biodiversity offsetting).</i> | Support | The amendments are supported as they clarify that offsets are only required to be considered for significant residual effects and not all residual effects. | Allow the point |
| Wellington Water Limited | S135/080 | Policy P62: Promoting discharges to land Amend Suggest that qualifiers are added that include consideration of the assimilative capacity of the soil, potential erosion and odour effects, reverse sensitivity effects, inability to use such land for agricultural production for market sensitivity reasons, and provide for rules to allow for practical discharges of effluent. | Support | As outlined in MDC's original submission, MDC acknowledges the intent of the policy but the issues associated with achieving the intent will take time. The qualifiers proposed in submission point S135/080 acknowledge some of the issues with land disposal and on this basis are supported. | Allow the point |

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|---|----------------------|--|--------------|---|--------------------|
| Rangitane o Wairarapa Inc | S279/113 | Policy P62: Promoting discharges to land Amend Policy P62 as follows: Policy P62: <i>Promoting Requiring discharges to land The discharge of contaminants to land shall occur in situations where direct discharge of contaminants to water will cause adverse effects on:(a) aquatic ecosystem health(b) mahinga kai(c) contact recreation, or (d) Māori customary use.</i> | Oppose | For the reasons outlined in MDC's original submission point S367/080, MDC opposes the term "requiring" as it is unduly restrictive. The relief sought also raise affordability issues for local authorities and their communities. | Disallow the point |
| Fish and Game | S308/060 | Policy P63: Improving water quality for contact recreation and Maori customary use Amend so that the policy requires water quality to be managed for primary contact recreation and not secondary contact recreation. | Oppose | The requirement for primary contact recreation is opposed as it is considered overly onerous, restrictive and unaffordable. | Disallow the point |
| Carterton District Council | S301/046 | Policy P73: Minimising adverse effects of stormwater discharges Oppose Delete Policy P73 or amend it to clarify that it addresses significant adverse effects of stormwater only (if there are any in particular case). | Support | The suite of policies impose a significant work programme and associated costs on TLA's over a short timeframe, and on this basis the deletion of the policy is supported. | Allow the point |
| South Wairarapa District Council | S366/134 | Policy P73: Minimising adverse effects of stormwater discharges Oppose [Not stated] | Support | Although no specific relief is sought, MDC supports the submission point opposing Policy 73 and supports the deletion of the policy. The suite of policies impose a significant work programme on TLA's over a short timeframe. | Allow the point |
| Rangitane o Wairarapa Inc | S279/123 | Policy P73: Minimising adverse effects of stormwater discharges Amend. To ensure the Plan is directive in the regard, the policies should include dates by which the outcomes will be achieved. That includes a date by which existing contamination of stormwater from wastewater networks is resolved. The discharge of human sewage via stormwater discharges to water is not appropriate and should be resolved as soon as practicable and not later than by 2030. | Oppose | Policy 73 relates to stormwater with wastewater addressed in other policies. MDC opposes the imposition of a timeframe within Policy 73 in relating to wastewater. Such a timeframe was not included in any section 32 reports and therefore the implications have not been explored. | Disallow the point |
| South Wairarapa District Council | S366/135 | Policy P77: Assessing resource consents to discharge stormwater containing wastewater Oppose [Not stated] | Support | Although no specific relief is sought, MDC supports the submission point opposing Policy 77 and supports the deletion of the policy. The suite of policies impose a significant work programme on TLA's over a short timeframe. | Allow the point |
| Wellington Water Limited | S135/092 | Policy P78: Managing stormwater from large sites Clarify how this policy relates to provisions about local authority stormwater networks. In accordance with recommended policy construction (Quality Planning website) change the policy to be a list of matters of environmental assessment. Clarify the use of "good management practice" or remove the term. | Support | The concerns raised by Wellington Water Ltd are supported as the implications and application of the policy are unclear. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|----------------|--|----------------------------|
| Rangitane o Wairarapa Inc | S279/241 | Policy P83: Avoiding new wastewater discharges to fresh water Amend [see submission point s279/124 ²] | Oppose in part | The exact relief sought in the submission is unclear as submission point S279/124 seeks the retention of policy 83 as notified. MDC generally supports material changes to existing discharges but needs clarification that economic growth is not prevented by this amendment. | Disallow the point in part |
| Porirua City Council | S163/073 | Policy P96: Managing land use Amend Provide further clarification within the policy to make it more meaningful. | Support | MDC supports the submission point as the intent of the policy is unclear. The note also makes reference to a “limit, target and/or allocation framework” but it is not clear from the policy what this framework will specifically relate too. | Allow the point |
| Hutt City Council | S84/019 | Policy P102: Reclamation or drainage of the beds of lakes and rivers Oppose Reconsider the use of the term 'avoid' and ensure that it does not unnecessarily and inappropriately constrain activities that result in effects that are significant and/or provide essential services for the health and safety of the community and protection of the environment. Provide a policy framework that provides a pathway for new infrastructure reasonably needed to support existing or planned future development to gain resource consent. This would allow for resource consent for these activities to be granted in appropriate circumstances. | Support | In MDC’s original submission, MDC supported policy 102 clause d). The submission point by Hutt City Council is supported as it highlights the importance and role of regionally significant infrastructure. | Allow the point |
| Fish and Game | S308/069 | Policy P102: Reclamation or drainage of the beds of lakes and rivers Delete. Reclamation or drainage of the beds of rivers and lakes should be prohibited | Oppose | The submission point is opposed as a prohibited activity status is disproportionate to the effects of the activity and ignores the need for reclamation in some circumstances and for some activities. | Disallow the point |
| 5. General | | | | | |
| Porirua City Council | S163/165 | Rules Amend [Make clear how rules apply to sites classified in multiple schedules e.g. Pauatahanui Inlet - does Rule R109 or R162 take precedence?] | Support | MDC supports the submission point seeking clarification on the relationship between, and application of, multiple rules to a proposed activity. Such clarification would assist in plan interpretation and application. The point aligns with the relief sought by MDC seeking clarification as to how the term “more specific” is to be applied. | Allow the point |
| 5.1 Rules – Air Quality | | | | | |

² S279/124 Policy P80: Replacing wastewater discharge consents

Support with amendments. Retain P83 as notified. New discharges to apply to coastal water, include a 2030 timeframe, ensure existing discharges meet freshwater limits and targets, avoid adverse effects on sites of significance to mana whenua, nga taonga nui a kiwa and outstanding water bodies.

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|--|-----------------|--|-------------------------|
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/079 | 5.1 Air quality rules Amend the rules so that agrichemical use in public places and roadsides is permitted under similar conditions as the Operative Plan, including that the activity does not require an annual spray plan, neighbour notification, or a risk assessment. Include a cross-reference to Rules R36-R38 in the air discharges rules section to aid the reader. | Support | The submission point is supported as it recognises the overly onerous nature of the notified rules in terms of MDC's routine weed spraying that takes place on Council owned assets such as parks and roadsides. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/013 | Rule R24: Flaring of gas - discretionary activity Amend Include rules that specifically address the types of air discharges from solid waste disposal activities, and that appropriately differentiates activity status with various levels of effect. | Support | MDS supports the submission point as the lack of specific rules relating to discharges to air from landfills inappropriately automatically triggers a discretionary activity status. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/016 | Rule R24: Flaring of gas - discretionary activity Amend Include a rule that specifically addresses odour, and in particular provides for minor discharges as a permitted activity. | Support | The submission point is supported as the provision of a specific rule and corresponding activity status would appropriately reflect the nature of the effects. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/014 | Rule R24: Flaring of gas - discretionary activity Amend Include a rule that provides for minor discharges to air from landfills as a permitted activity | Support | The submission point is supported as the provision of a specific rule and corresponding activity status would appropriately reflect the nature of the effects. | Allow the point |
| Greater Wellington Regional Council | S133/007 | 5.1.8 Food, animal or plant matter manufacturing and processing Amend to permit the refinement of sugars, roasting or drying of berries, grains or plant matter (except roasting of green coffee beans in Rule R30) curing by smoking, flour or grain milling, baking, roasting, deep fat or oil frying not exceeding 250kg/hour of product subject to standard air condition in respect of odour, smoke and dust over the boundary. | Support in part | While MDC supports the provision of permitted activities, it remains concerned about the limited range of permitted activities. | Allow the point in part |
| 5.2 Rules – Discharges to Water | | | | | |
| Wellington City Council | S286/043 | 5.2.3 Stormwater Roading, Amend Clarify how Rules 48-53 relate to stormwater runoff from the roading network and ensure that a resource consent for stormwater run-off is not required. | Support | In MDC's original submission MDC sought deletion of Rules R50 and R51 given the resulting potential significant work programme on local authorities in the Wairarapa. The submission point of Wellington City Council raises a further uncertainty associated with the rule and the sought clarification is supported. | Allow the point |
| Wellington Water Limited | S135/142 | Rule R48: Stormwater from an individual property - permitted activity Amend Clarify how the rules relate to stormwater runoff from the local authority road network that goes into the local authority stormwater network. | Support | The submission point of Wellington Water Limited raises an uncertainty associated with Rule R48 and the relief sought clarification is supported as it is presently unclear whether the rule would apply to local roads (that could be considered one property in that they are contiguous and under one ownership). | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|--|--------------|--|--------------------|
| Porirua City Council | S163/088 | Rule R50: Stormwater from a local authority network at plan notification - controlled activity Amend condition (a) to read: "the resource consent application is received within two years of the date that the Natural Resources Plan becomes operative". Introduce a review clause to implement further limits when they are established by the whitua process. Amend Item 3 in Matters of control so that the duration of controlled activity consents is a maximum of 5 years after the Plan is made operative or from the date that consent is granted, whichever is the greater. | Support | For the reasons outlined in the submission point, MDC supports an amended timeframe. Such a timeframe would better reflect the process. | Allow the point |
| Porirua City Council | S163/091 | Rule R53: All other stormwater - discretionary activity Amend. Review the provisions and amend to ensure alignment between the rules for consistency of stormwater management. | Support | As MDC understands it, Rule R50 and R52 would not apply to local roads. On the basis of the lack of clarity as to how the rules in Section 5.2.3 apply to roading (refer submission point S286/043) it could be inferred that local roads within the Wairarapa that are not connected to a stormwater system (i.e. do not have kerbs or swales and so the stormwater discharges directly into adjacent land or water) would not be subject to Rules 50 or 52 and therefore would by default be a discretionary activity under Rule 53. On this basis the relief sought by Porirua City Council is supported. | Allow the point |
| 5.3 Rules – Discharges to Land | | | | | |
| Carterton District Council | S301/058 | Rule R58: Water races - discretionary activity Neither support or oppose CDC seeks clarification of whether the activity requiring consent is the discharge of contaminants into a water race, or discharge of water race water and contaminants into other water. | Support | Notwithstanding MDC's original submission opposing Rule R58 (refer submission point S367/107) MDC supports clarification as to whether the activity requiring consent is the discharge of contaminants into a water race, or discharge of water race water and contaminants into other water. | Allow the point |
| Rangitane o Wairarapa Inc | S279/177 | Rule R61: Existing wastewater - discretionary activity Amend the rule to apply to existing discharges up until an appropriate date not later than 2030. Insert a new non-complying activity rule for existing discharges to freshwater after the date specified above. | Oppose | MDC opposes the amendments sought as they are considered unreasonably restrictive and fail to recognise that small communities need sufficient time to make significant infrastructure changes due to cost and practical constraints. | Disallow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|-----------------|---|-------------------------|
| Hutt City Council | S84/023 | Rule R62: New wastewater to fresh water - non-complying activity Oppose Amend Rule R62 and change the activity status from a non-complying activity to a discretionary activity. | Support in part | The rule is supported in part (in terms of deletion of the non-complying acidity status). If the relief sought in MDC original submission point S367/108 ³ is not accepted, MDC supports the change relief sought in submission point S84/023 as the resulting activity status (discretionary) would be the same for new or existing discharges. However, the relief sought in submission point S367/108 is preferred as it simplifies the rule framework and removes the uncertainty as to what is a new or existing discharge. | Allow the point in part |
| Rangitane o Wairarapa Inc | S279/178 | Rule R62: New wastewater to fresh water - non-complying activity Oppose That the rule regarding the new discharge of wastewater to fresh water be amended to state that this is a prohibited activity. | Oppose | A prohibited activity status is opposed as it is overly restrictive and fails to recognise the operational requirements associated with municipal wastewater treatment plants. | Disallow the point |
| NZ Transport Agency | S146/154 | Rule R67: Discharges inside sites of significance - non-complying activity Oppose Amend Rule 67: <i>The discharge of water or contaminants into water, or onto or into land where it may enter water: (a) inside a site or habitat identified in ... and (b) that is not permitted by Rules R42, R43, R44 or R45; and (c) that is <u>not a discharge associated with a regionally significant infrastructure</u>.</i> Or introduce a new discretionary rule specific to discharges of water or contaminants into water, or onto or into land where it may enter water from regionally significant infrastructure inside sites of significance. | Support in part | While MDC does not oppose the non-complying activity status for discharges into sites of significance, it supports clarification as to the relationship with other rules (in particular rules R50, R53 and R61). | Allow the point in part |
| Rangitane o Wairarapa Inc | S279/182 | Rule R79: Discharge of treated wastewater - controlled activity Amend Include as matters of control and discretion: the effects of the discharge, including cumulative effects, on meeting the freshwater objectives and limits in the Plan; The effects of the discharge of sites listed in Schedules A to F and H; and The effects on the cultural and spiritual values of mana whenua. Clarified that mana whenua will be considered as potentially affected parties. | Oppose | The additional matters of control requested are already addressed in Rule R79. MDC opposes the provision of a notification statement relating to mana whenua as such a notification requirement is out of accord with the controlled activity status. | Disallow the point |
| Fish and Game | S308/090 | Rule R79: Discharge of treated wastewater - controlled activity Amend the rule so that activities are required to achieve the freshwater objectives. Insert a new rule that makes existing discharges non-complying after 2030 where freshwater outcomes in section 3 tables are not achieved. New activities which would cause or contribute to the freshwater objectives in section 3 tables being exceeded should be prohibited Give effect to relief sought policy P71 and apply the standards as amended in relation to policy P71 | Oppose | In MDC's original submission (point S367/113) MDC sought deletion of Rule 79 and associated re-write. The relief sought by Fish and Game is opposed as it would restrict the ability to undertake discharge to land which is the favoured approach in the policy framework over discharges to water. | Disallow the point |

³ Retain the intent of Rule R61, with an amendment as follows: *Rule R61: ~~Existing-Discharge~~ of wastewater -discretionary activity. The discharge of wastewater: ... (b) ~~that is an existing discharge~~ into fresh water*

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|---|--------------|---|--------------------|
| South Wairarapa District Council | S366/113 | Rule R79: Discharge of treated wastewater - controlled activity Oppose Delete Rule R79 and rewrite to provide for a Permitted activity rule land discharge of treated effluent; Controlled activity for all other land discharges, subject to reasonable matters of control, not prescriptive operational and asset management directives; and Provision for alternative discharge designs and methods, not a prescriptive standard based on a single method. | Support | MDC supports the deletion and re-writing of Rule 79. All Rules associated with disposal to land will be very prescriptive for the Wairarapa and are these the right rules for all potential applications – for example salt build up on irrigated land. | Allow the point |
| Rangitane o Wairarapa Inc | S279/259 | Rule R80: Discharge of treated wastewater - restricted discretionary activity Amend [see submission point s279/182] | Oppose | Refer above commentary on point S279/182. | Disallow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/018 | Rule R93: All other discharges to land - discretionary activity Amend Include specific rules addressing discharges to land from landfills. | Support | MDC supports the submission point as given the importance of landfills, a specific rule is appropriate. | Allow the point |
| 5.4 Rules – Land Use | | | | | |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/022 | 5.4.4 Earthworks and vegetation clearance Not stated Amend the plan to clarify how erosion prone land is to be determined. Amend [rules R99-R101] to clarify how they relate to erosion prone land. | Support | MDC supports the submission point as the terms and application of the rules are unclear. Specifically, it is unclear how erosion prone land is to be determined. Clarification is also sought that the earthworks rule does not apply to ‘erosion prone land’, rather it is only vegetation clearance which is subject to the term. Such clarification would assist in plan interpretation and application. | Allow the point |
| Upper Hutt City Council | S107/006 | Rule R99: Earthworks- permitted activity Amend the earthworks and vegetation clearance rules to note that approval may also be required from the relevant territorial authority. | Support | The addition of a note would be beneficial in terms of highlighting to plan users that the relevant district plan may also have relevant earthwork provisions which need to be considered. | Allow the point |
| PF Olsen Limited | S131/006 | Rule R101: Earthworks and vegetation clearance - discretionary activity Amend Outline vegetation clearance on non-erosion prone land as a permitted activity. | Support | The submission point is supported as the rules as notified would provide for vegetation clearance on non-erosion prone land as a discretionary activity under the default Rule R101. Such an activity status is overly onerous and is thought to not be the intent of the rule framework. The insertion of a permitted activity rule would assist in plan interpretation and application. | Allow the point |
| 5.5 Rules – Wetlands and Beds of Lakes and Rivers | | | | | |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|--|--------------|--|-----------------|
| Porirua City Council | S163/115 | Rule R104: Structures in natural wetlands and significant natural wetlands - permitted activity Amend subclause (f) to allow some exemptions for local authorities to use some larger machinery for maintenance and repair where necessary. This can be subject to conditions regarding such matters as refuelling, specified timeframes, etc. | Support | MDC supports the intent of the rule as notified but supports the submission point in terms of seeking some exemptions for larger machinery. | Allow the point |
| Porirua City Council | S163/117 | Rule R106: Restoration of natural wetlands, significant natural wetlands and outstanding natural wetlands - controlled activity Amend the rule to either permit activities that are stipulated in and carried out in accordance with are approved restoration management plan, or require controlled activity consents to be accompanied by a restoration management plan at the time of consent, so both can be assessed together. | Support | As highlighted in the submission, activities in accordance with an approved restoration management plan have already been assessed as part of the plan process and a permitted activity status suits therefore appropriate. On this basis the submission point is supported. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/078 | Rule R108: Activities in natural wetlands and significant natural wetlands - non-complying activity Reclassify [activities necessary in natural wetlands for roading and parks and gardens activities] as discretionary activities as they were in the Draft Natural Resources Plan (Draft NRP) rather than non-complying. | Support | MDC supports a discretionary activity status for roading and parks and gardens activities given the importance of these activities and the resulting public benefit. A discretionary activity status still allows for a full assessment of the effects and for consent to be declined. | Allow the point |
| Porirua City Council | S163/118 | Rule R109: Activities in outstanding natural wetlands - discretionary activity Clarify whether structures like erosion protection for walkways are included within the scope of "a structure for the purpose of recreation". Review this and related rules to prove interpretation and practical application regarding multiple rules for the same activity. Define "maintenance", particularly in terms of whether this extends to including any form of upgrade in relation to this rule | Support | For the reasons outlined in the submission, the submission point is supported. | Allow the point |
| Porirua City Council | S163/119 | Rule R111: Reclamation of outstanding natural wetlands - prohibited activity Delete this rule and include reclamation as a non-complying activity under rule R110. | Support | MDC does not support a prohibited activity status for all reclamation activities as it is concerned unreasonable restive in some circumstances. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/040 | Rule R112: Maintenance, repair, replacement, upgrade or use of existing structures (excluding the Barrage Gates) - permitted activity Not stated Amend the plan to clarify that temporary stream damming and diversion required for in-stream structure works are included in all relevant rules for structures in a river bed, or provide for temporary damming and diversion as a permitted activity (subject to reasonable conditions). | Support | The submission point is supported as it would provide clarity as to whether these activities are included. It is appropriate they are included as they would be limited to the duration of the works. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/038 | Rule R112: Maintenance, repair, replacement, upgrade or use of existing structures (excluding the Barrage Gates) - permitted activity Amend Include 'damming of water' in the list of associated activities that are authorised by the rule. Simplify permitted activity condition (g) of Rule R112 to make it easier to assess proposals against | Support | The submission point is supported as it would provide clarity as to whether damming is included. | Allow the point |

| Details of the submission you are commenting on | Submission reference | Relief sought in the Submission (as derived from the summary) | MDC position | Reasons | Relief sought |
|---|----------------------|--|-----------------|---|-------------------------|
| New Zealand Defence Force | S81/034 | Rule R117: New structures - permitted activity Amend Make the necessary amendments to R117 to specifically provide for stormwater outlets and in-stream erosion protection structures. | Support | For the reasons outlined in the submission, the submission point is supported. MDC acknowledges the importance of in-stream structures and agrees they should be specifically provided for. | Allow the point |
| Carterton District Council | S301/064 | Rule R117: New structures - permitted activity Amend Rule R117 to provide for maintenance of stream alignment to protect essential infrastructure. Delete condition R117(i) | Support in part | MDC supports the amendment to Rule R117 to provide for the maintenance of stream alignment to protect essential infrastructure as such a provision would duly recognise the importance of, and provide for the ongoing use and operation of regionally significant infrastructure. | Allow the point in part |
| Carterton District Council | S301/065 | Rule R121: Maintenance of drains - permitted activity Oppose in part Delete the prescriptive list of conditions from Rules R121 and R122. | Support | MDC submitted on Rule R121 and R122 seeking their deletion. The submission point by Carterton District Council is supported on the basis the rules are unnecessarily complex and unworkable. | Allow the point |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council | S85/075 | Rule R135: General rule for taking, use, damming and diverting water - discretionary activity Amend Consider authorising stormwater diversion in the stormwater discharge rules in section 5.2.3 of the NRP (i.e. rule bundling). | Support | As noted in the submission, the PNRP does not specifically address stormwater diversions and whether it would fall under Rule R135. This seems unnecessary given the effects of this activity and therefore the relief sought to authorise stormwater diversions in the stormwater discharge rules in Section 5.2.3 is supported. | Allow the point |
| 5.6 Rules – Water Allocation | | | | | |
| Nga Hapu o Otaki | S309/041 | Rule R136: Take and use of water - permitted activity Amend Rule amended so that 'all water takes from surface water bodies and groundwater have a water meter installed, and records are kept and provided to WRC on request' | Oppose | While MDC considers there is some uncertainty as to how Clause f) ⁴ is to be assessed and applied as a permitted activity condition, MDC opposes an outright requirement that a meter be installed for all takes where the other permitted activity conditions are met. Such a requirement would be excessive for landowners and considered unnecessary given the permitted activity status for such takes. It is also noted the 'Resource Management (Measurement and Reporting of Water Takes) Regulations 2010' excludes certain takes (e.g. less than 5 litres per second) due to cost implications. | Disallow the point |
| Dairy NZ and Fonterra Co-operative Group Ltd | S316/125 | Rule R138: Water races - permitted activity Support Retain Rule R138 | Support | The submission point is supported as it appropriately provides for takes from water races which are an important feature and asset in the Wairarapa. | Allow the point |

⁴ Clause f) "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".

Further Submission on The Greater Wellington Natural Resources Plan Review.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (PNRP).

All sections of this form need to be completed for the submission to be accepted.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

By email: regionalplan@gw.govt.nz

Or Post:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

DETAILS OF FURTHER SUBMITTER:

- *¹ I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

“I enjoy the sport of surfing, and appreciate the benefits surfing brings to the Wellington Region.”

*** Name: Jeremy Richardson**

Name of Organisation you represent: Victoria University

***Address: 35 Highbury Street**

***Phone/ Fax 0275987333**

EMAIL ADDRESS: jem.syar.rich@gmail.com

¹ * red indicates details that must be filled in, make your choice by checking which red box(applies to you). You can simply accept the reason; “I enjoy the sport of surfing and appreciate the benefits surfing brings to the Wellington Region” or replace that with something else. Also, please make your choice for the 3 red boxes on page 2

- I do not wish to be heard in support of my further submission; or
- This One - I do wish to be heard in support of my further submission; and, if so,
- I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Details of the submission(s) I am commenting on :

1. Submitter 282: Wellington International Airport Limited.

Address for contact : Mitchell's Partnerships Ltd.
PO Box 489 Dunedin, 9054

Email Claire.hunter@mitchellpartnerships.co.nz

CC. greg.thomas@wlg.aero

I oppose submitter 282 in regard to the following points:

WIAL Submission Page 5 Paragraph xi:

Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

Policy 15(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse

effects of activities on other natural features and natural landscapes in the coastal environment;

Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library:
<https://natlib.govt.nz/records/23046068?search%5Bpath%5D=items&search%5Btext%5D=Lyall+Bay+1938>

“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

It should be pointed out that from case law the precedence is with respect to environmental impacts that they are assessed on, what is there today, not what it used to be like.

For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before the old structure was there, it is the impact on the existing environment.

In this case, it would mean that WIAL cannot argue that because the historic human-induced changes to Lyall Bay resulted in a high-quality surfing break, it does not have to consider it or that it has no value because it's not 'natural'. Furthermore, and most importantly, the reclamation may be manmade (i.e. not natural), however, the break that formed beside it formed naturally due to coastal processes and is an entirely natural feature in response to human intervention (it is comprised of swell, currents, water levels, seabed morphology and wind, as per Schedule 1 of the NZCPS).

Relief Sought:

- | | |
|--|--|
| Dismiss Wial's decision sought to | remove Objective 037, |
| Dismiss Wial's decision sought to | revise Schedule K of the PNRP with intent to remove the Corner surf break. |
| Dismiss Wial's decision sought to | delete P51 of the PNRP |

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and
- (b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

Policy 13 Preservation of natural character

2 (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

I note that other policies in the PNRP that relate to natural features (such as 4.6.5 Natural features and landscapes and special amenity landscapes (b))refer to avoid, remedy, or mitigate.

I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by ~~minimising~~ **avoiding remedying, or mitigating** the adverse effects on:

(a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and

(b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Note:

The deletion I seek is indicated by strikethrough, the addition I seek is indicated by bold and underline

SIGNED:

*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

Please note:

All information included in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on the GWRC website and will include all personal details included in the further submission.

PLEASE CC THIS EMAIL TO WIAL, AN OBLIGATION OF THE FURTHER SUBMISSION
PROCESS:

Claire.hunter@mitchellpartnerships.co.nz

or by Post:
Wellington International Airport Ltd
c/o Mitchell Partnerships Ltd
P.O. Box 489
Dunedin 9054

Submitter ID:

File No:

Further Submission on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

ORGANISATION (* the organisation that this submission is made on behalf of)

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

PHONE

FAX

EMAIL

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:

Date:

23-03-2016

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|--|---|--|--|--|
| Name of person/group making original submission and postal address. | The original submission number can be found on the submitter address list. | Whether you support or oppose the submission. | Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Why you support or oppose each submission point. | The part or whole of each submission point you wish to be allowed or disallowed. |
| e.g. Joanne Bloggs 12 Pine Tree Avenue Redwood | e.g. submitter S102 | e.g. Oppose | e.g. Oppose all of submission point S102/41 | e.g. The submission point does not recognise... | e.g. Disallow the parts of S102/41 relating to... |

Please see the attached table setting out the specific further submission points of Meridian Energy Limited.

GWRC PROPOSED NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION:

FURTHER SUBMISSION POINTS OF MERIDIAN ENERGY LIMITED (*MEL*):

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|--------------------|--------------------------------|--|---|--|
| DEFINITIONS | | | | |
| | <i>Biodiversity Offset</i> | NZTA S146/008 | Requests amendment to delete requirement for no net loss and net gain such that all proposals are considered on their merit | Support: MEL has an interest in the application of the principle of biodiversity offsetting within the Wellington region and nationally and, in particular, in the 'no net loss' approach. Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |
| | <i>Biodiversity Offset</i> | Minister of Conservation S75/006 | Requests amendment to emphasise no net loss and preferably a net gain of biodiversity on the ground. | Oppose: MEL has an interest in the application of the principle of biodiversity offsetting within the Wellington region and nationally and, in particular, in the 'no net loss' approach. Requests: Disallow the submission. |
| | <i>Operational requirement</i> | Vector Gas S145/011 NZTA S146/027 | Request amendment: <i>'When an activity needs to be carried out in a particular location or way in order to be able to function <u>safely</u>, effectively and efficiently.</i> | Support: The requested amended wording is a sensible addition in the context of regionally significant infrastructure and renewable energy generation activities. Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|-------------------|--|--|--|---|
| | <i>Regionally significant infrastructure</i> | Wellington Electricity Lines Limited S126/006 | Requests addition of: <ul style="list-style-type: none"> <i>facilities for the generation, transmission and distribution of electricity a network (as defined in the Electricity Industry Act 2010).</i> | Support: The submission makes a valid point about the correct reference to relevant legislation. Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |
| | <i>Regionally Significant Infrastructure</i> | Powerco S29/060 | Requests addition of: <i>'Facilities for the generation and/or transmission of electricity where it is supplied to the national electricity grid and/or the local distribution network. This includes supply within the local electricity distribution network....'</i> | Support: It is appropriate to explicitly include provision for electricity supply to the national grid and the local distribution network. Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |
| OBJECTIVES | | | | |
| Objectives | Requested new Objective | NZTA S146/064 | Add new objective: <i>'Discharges associated with regionally significant infrastructure are managed through the adoption of the best practicable option.'</i> | Support in part: Experience has demonstrated that adoption of the best practicable option approach is appropriate and sustainable for electricity generation activities as examples of regionally significant infrastructure. Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |
| Objectives | Requested new Objective | NZTA S146/043 Vector Gas Ltd S145/016 | Add new objective: <i>'To recognise that regionally significant infrastructure represents appropriate use and development in all environments where there are</i> | Support in part: Regionally significant infrastructure represents appropriate use and development in many environments and is subject to functional needs and operational requirements. MEL wishes to |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|-------------------|-------------------------|--|---|---|
| | | | <i>functional needs or operational requirements.'</i> | participate in any hearings about the wording of such an additional objective. Requests: Allow the submission point or such further or other relief as will achieve a similar outcome. |
| Objectives | Requested new Objective | NZTA S146/042 Vector Gas Ltd S145/016 | Add new objective: <i>'The safe, effective and efficient use, operation, maintenance, upgrade and development of regionally significant infrastructure is provided for.'</i> | Support: Given the importance of this infrastructure, it is appropriate that the policy framework explicitly recognises and provides for new and existing regionally significant infrastructure. The One Plan Objective 3-1 provides a useful operative example and is worded: <i>'Have regard to the benefits of infrastructure and other physical resources of national importance by recognising and providing for their establishment, operation, maintenance and upgrading.'</i> Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |
| Objectives | Requested new Objective | Wellington International Airport Ltd S282/005 | Insert new objective: <i>'Development of regionally significant infrastructure: Provide for an enable the development and growth of regionally significant infrastructure.'</i> | Support: Given the importance of this infrastructure, it is appropriate that the policy framework explicitly recognises and provides for new and existing regionally significant infrastructure. The One Plan Objective 3-1 provides a useful operative example and is worded: <i>'Have regard to the benefits of infrastructure and other physical resources of national importance by recognising and providing for their</i> |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|---------------|---------------------|--|---|--|
| | | | | <i>establishment, operation, maintenance and upgrading.</i> Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |
| Objective 12 | | Spark NZ S98/005 | Add new Objective 12A: <i>'Recognise that some existing and future regionally significant infrastructure has a functional need and/or operational requirement to be located and/or operated in a particular environment.'</i> | Support in part: The PNRP includes definitions and policies that acknowledge the functional needs and operational requirements of regionally significant infrastructure. MEL has an interest in the wording of any such additional objective and notes that One Plan Policy 3-3 provides a potentially useful example. Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |
| Objective O19 | | CentrePort S121/026 KiwiRail Holdings S140/018 Horticulture NZ S307/016 Wellington International Airport S282/011 Rangitane o Wairarapa S279/030 | Amend: <i>'The interference adverse effects from use and development on natural process is minimised avoided, remedied or mitigated.'</i> | Support in part: The suggested alternative wording accords better with the framework of the RMA. The expression 'interference' has no clear meaning in this context. Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |
| Objective O38 | | NZTA S146/060 Dairy NZ and Fonterra S316/039 Mahaki Holdings S370/088 and the identical submissions of | Delete Objective O38 | Support: MEL opposes Objective O38. Requests: Allow the submission point and delete Objective O38. |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|---------------|---------------------|--|--|--|
| | | others (please note this further submission point applies also to the identical submission points made by multiple others) | | |
| Objective O38 | | Mahaki Holdings S370/044 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others) | Amend: <i>'Identified special amenity landscape values are maintained <u>and where possible identified or enhanced over time.</u>'</i> | Oppose: MEL opposes Objective O38 and has requested its deletion. Requests: Disallow the submission point and delete Objective O38. |
| Objective O38 | | Rangitane o Wairarapa Inc. S279/048 | Provide a schedule of special amenity landscapes | Oppose: MEL opposes Objective O38 and has requested its deletion. Requests: Disallow the submission point and delete Objective O38. |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|------------|---------------------|---|--|---|
| SCHEDULES | | | | |
| Schedule G | | Environmental Defence Society Inc. S110/017 | Amend to include a clear distinction between mitigation and offsets based on the goal of each response action. | Neither support nor opposition: MEL has an interest in the application of the principle of biodiversity offsetting within the Wellington region and nationally. Requests: MEL wishes to participate in any hearings that address the wording of the principles in Schedule G (biodiversity offsetting) and requests that any amendments accord with the amendments requested in MEL's own original submission. |
| | | GBC Winstone S66/026 | Delete 3 (additional conservation outcomes), 4 (a) (demonstrate positive effects) and 6 (no net biodiversity loss) | Support in part: MEL has an interest in the application of the principle of biodiversity offsetting within the Wellington region and nationally and, in particular, in the 'no net loss' approach. Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |
| | | Minister of Conservation S75/207 and S75/208 | Amend and include direction for good practice in biodiversity mitigation | Neither support nor opposition: MEL has an interest in the application of the principle of biodiversity offsetting within the Wellington region and nationally. Requests: MEL wishes to participate in any hearings that address the wording of the principles in Schedule G (biodiversity offsetting) and requests that any amendments accord with the amendments |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|------------------|-----------------------------------|--|---|---|
| | | | | requested in MEL's own original submission. |
| POLICIES | | | | |
| Policies | <i>Requested New Policy</i> | NZTA S146/078 Vector Gas Ltd S145/027 | Add a new policy: <u>'Resource consent durations for regionally significant infrastructure applications required under ss 13, 14 and 15 of the RMA will generally be granted for the maximum period of time unless reasons are identified during the consent process that make this inappropriate.'</u> | Support: The proposed approach is appropriate for regionally significant infrastructure. Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |
| Policies | <i>Requested New Policy</i> | NZTA S146/075 | Add a new policy: 'Adverse effects shall generally be managed by : (a) <u>Avoiding effects;</u> (b) <u>Where effects cannot be practically avoided, remedying them;</u> (c) <u>Where effects cannot be practically remedied, mitigating them; and where residual adverse effects remain, it may be appropriate to consider the use of off-sets'.</u> | Support in part: The proposed 'cascade' approach is broadly appropriate. However, the focus should be on avoiding significant adverse effects and on remedying or mitigating other adverse effects as opposed to a focus on all effects. Requests: Allow the submission point in part, amending the expression 'effects' to read 'adverse effects' and, in (a) amending the wording to 'avoiding significant adverse effects'. Alternatively, such further or other relief as will achieve the same outcome. |
| Policy P4 | <i>Minimising adverse effects</i> | NZTA S146/076 | Requests amendments including consideration of the operational requirements and functional needs of regionally significant infrastructure (and other improvements to wording) | Support: Consideration of operational requirements and functional needs for regionally significant infrastructure should be explicit in the policy framework. |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|------------|---|--|--|--|
| | | | | Requests: Allow the submission point or further or other relief as will achieve the same outcome. |
| Policy P4 | <i>Minimising adverse effects</i> | Ravensdown S310/023 | Requests amendments including consideration of the operational requirements and functional needs of regionally significant infrastructure | Support: Consideration of operational requirements and functional needs for regionally significant infrastructure should be explicit in the policy framework. Requests: Allow the submission point or further or other relief as will achieve the same outcome. |
| Policy P9 | <i>Public access to and along the c.m.a. and the beds of lakes and rivers</i> | Chorus NZ Ltd S144/010 Spark NZ S98/010 | Except where it is necessary to:... (d) <u>Protect Regionally Significant Infrastructure</u> | Support: The request is appropriate and consistent with the RPS approach. Requests: Allow the submission point or further or other relief as will achieve the same outcome. |
| Policy P12 | <i>Benefits of regionally significant infrastructure</i> | Rangitane o Wairarapa S279/079 | Amend to clarify that the operation, use, maintenance and upgrade can still have adverse effects that need to be managed; and add a new policy to ensure that new or increases in scale or extent of existing regionally significant infrastructure and REG shall avoid adverse effects on sites in Schedules A to F, H and J. | Support and oppose: It is acknowledged that adverse effects need to be managed. However, the single approach of <i>avoidance</i> only of all effects on sites within the named Schedules is not consistent with the framework of the RMA. Requests: Allow the submission point in part but disallow the requested amendments that would require avoidance of all adverse effects. |
| Policy P13 | <i>Regionally significant infrastructure</i> | Rangitane o Wairarapa S279/080 | Amend to clarify that the operation, use, maintenance and upgrade can still have adverse effects that need to be managed; and add a new policy | Support and oppose: It is acknowledged that adverse effects need to be managed. However, the single approach of <i>avoidance</i> only of all effects on sites within the named |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|----------------------|--|---|--|--|
| | | | to ensure that new or increases in scale or extent of existing regionally significant infrastructure and REG shall avoid adverse effects on sites in Schedules A to F, H and J. | Schedules is not consistent with the framework of the RMA. Requests: Allow the submission point in part but disallow the requested amendments that would require avoidance of all adverse effects. |
| Policy P13 | <i>Regionally significant infrastructure</i> | NZTA S146/083 Vector Gas S145/029 NZTA S146/083 | Amend to include use, operation, maintenance, upgrade <u>and development</u> of regionally significant infrastructure. Also add: <i>'The development of new regionally significant infrastructure and renewable energy generation activities to meet the needs of the community are beneficial and are generally appropriate.'</i> | Support in part: MEL agrees that the development of new, as well as the operation/maintenance/upgrading of regionally significant infrastructure should be provided subject to avoiding, remedying or mitigating adverse effects. Requests: Allow the submission point or such further or other relief as will achieve the same outcome, acknowledging the need to avoid, remedy or mitigate adverse effects. |
| Requested New Policy | | Transpower NZ S165/010 | Policy 13A: <u>'Managing environmental effects of new National Grid infrastructure.</u> <u>When considering the environmental effects of new infrastructure associated with the National Grid, or major upgrades of the existing National Grid, decision makers shall have regard to:</u> (a) <u>The benefits of the infrastructure to meet the needs of present and future generations.</u> (b) <u>The extent to which any adverse environmental effects have been</u> | Support: The proposed matters for consideration are generally appropriate for regionally significant infrastructure. Requests: Allow the submission point or such further or other relief as will achieve the same outcome. |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|-------------------|---|--|--|--|
| | | | <u>avoided, remedied or mitigated by the route, site and method selection; and the constraints imposed by the technical and operational requirements of the National Grid.</u> | |
| Policy P14 | <i>Activities incompatible with regionally significant infrastructure</i> | Rangitane o Wairarapa S279/081 | Amend to clarify that the operation, use, maintenance and upgrade can still have adverse effects that need to be managed; and add a new policy to ensure that new or increases in scale or extent of existing regionally significant infrastructure and REG shall avoid adverse effects on sites in Schedules A to F, H and J. | Support and oppose: It is acknowledged that adverse effects need to be managed. However, the single approach of <i>avoidance</i> only of all effects on sites within the named Schedules is not consistent with the framework of the RMA. Requests: Allow the submission point in part but disallow the requested amendments that would require avoidance of all adverse effects. |
| Policy P25 | <i>Natural Character</i> | NZTA S146/090 Vector Gas S145/033 | Amend: 'Use and development shall avoid, remedy or mitigate significant adverse effects on natural character in the coastal marine area....and in the beds of lakes and rivers, and avoid remedy or mitigate other adverse effects of activities taking into account... (c) Whether it is practicable to protect natural character from inappropriate use and development through the use and development is appropriate after considering: (i) Using an the use of alternative locations, or | Support in part: The proposed approach is broadly appropriate for regionally significant infrastructure and for renewable energy generation activities. Requests: Allow the submission point and add to part (iv) ' <u>and renewable energy generation</u> ' along with regionally significant infrastructure. |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|------------|---------------------|---------------------------------------|--|---|
| | | | <p>form of development that would be more appropriate to that location; and</p> <p>(ii) Considering the extent to which functional need or existing use limits location and development options; and</p> <p>(iii) Considering the extent to which functional need or existing use limits location and development options; and</p> <p>(iv) <u>Whether the use and development is regionally significant infrastructure</u></p> | |
| Policy P25 | Natural character | Minister of Conservation S75/058 | Amend: '(d) whether it is practicable the ability to protect natural character from inappropriate use and development through: | <p>Oppose in part: The RMA requires protection from inappropriate use and development – not absolute protection in all situations.</p> <p>Requests: Retain the reference to protection of natural character 'from inappropriate use and development'.</p> |
| Policy P25 | Natural character | Rangitane o Wairarapa S279/090 | Amend: <u>Use and development shall must be managed to avoid significant adverse effects on natural character</u> | <p>Oppose in part: The proposed amendments are at odds with the 'cascade' approach to managing effects that is adopted in the PNRP.</p> |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|------------|--------------------------|--|--|--|
| | | | (d) Whether it is practicable to protect natural character from inappropriate use and development through (i) Using an alternative location, or form of development that would be more appropriate to that location, and Considering the extent to which functional need or existing use limits location and development options. | Requests: Disallow the submission point and adopt the cascade approach of avoiding, remedying or mitigating adverse effects and retain the matters for consideration detailed in Policy P25 or such further or other relief as will achieve the same outcome. |
| Policy P33 | Indigenous fish habitats | NZTA S146/096 | Amend: '....avoided <u>where practicable</u> .' | Support in part: The submission addresses the same point as Meridian's own submission but requests a different solution. Requests: Allow the submission point in addition to or as an amendment to the relief requested in MEL's original submission. |
| Policy P33 | Indigenous fish habitats | Roading, Parks and Gardens HCC, UHCC S85/035 Fertiliser Association NZ S302/038 | Revise the language to focus on protection from <i>significant</i> adverse effects and not 'more than minor' effects | Support in part: The submission addresses the same point as Meridian's own submission but requests a different solution. Requests: Allow the submission point in addition to or as an amendment to the relief requested in MEL's original submission. |
| Policy P33 | Indigenous fish habitats | Minister of Conservation S75/066 | Amend (b) and (c) to ensure that the policy requires avoidance of more than minor adverse effects. | Oppose: The requested amendment sets a very high threshold that is not consistent with the RMA approach. The RMA does not require avoidance of all effects that are <i>more than minor</i> . |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|--|--|---|--|---|
| | | | | Requests: Disallow the submission point. |
| 4.6 Sites with significant values | | RFBPS S353/003 | Include more specific provisions that include significant sites in the wider coastal environment and not just the c.m.a. | Oppose: The request is beyond GWRC's jurisdiction (which is limited to activities within the coastal marine area). Requests: Disallow the submission point. |
| Policy P44 | <i>Mana whenua values</i> | CentrePort S121/060 NZTA S146/106 KiwiRail Holdings S140/043 | Amend to say ' <u>protected from inappropriate use and development</u> ' | Support: The proposed wording addresses a similar point made in MEL's original submission and has merit. Requests: Allow the submission point in addition to or as an amendment to the relief requested in MEL's original submission. |
| Policy P138 | <i>Structures in sites with significant values</i> | Rangitane o Wairarapa S279/160 | Amend to require any adverse effects on the sites to be avoided | Oppose: The request defeats the intention of the Policy. There are other policies that more appropriately address the avoidance, remediation or mitigation of adverse effects. Also the focus should be on significant adverse effects and not all effects. Requests: Disallow the submission point. |

| Reference | Policy or Provision | Submitter Name & Submission Reference | Submitter's Submission Points | MEL Position, Reasons and Requested Decision: |
|--------------------------------------|---------------------------------------|---|---|---|
| RULES | | | | |
| Rule R42 permitted discharges | <i>New requested rule</i> | Wellington Water S135/138 | Provide a special category of permitted activity for regionally significant infrastructure or have consents trigger to controlled activity | Support: The requested amendment is similar to MEL's own submission on Rule R53. Requests: Allow the submission point and amend the rule framework in a manner that is consistent with MEL's own submissions on Rule R53 or such further or other relief as will achieve the same outcome. |
| Rule R42 | <i>Minor discharges</i> | Rangitane o Wairarapa S279/165 | Include SS standard for Schedule B, C F1b, F1c, F2a, F2b, F2c, F5 and H sites and amend 'zone of reasonable mixing' to ensure it does not extend into sites of significance identified in Schedules C and H | Oppose in part: It may not always be practicable to confine the zone of reasonable mixing in the manner requested and the request expands the scope of the SS standard in a manner that is potentially inappropriate. Requests: Disallow the submission point. |
| Rule R48 | <i>Permitted stormwater discharge</i> | Mahaki Holdings S370/062 and the identical submissions of others (please note this further submission point applies also to the identical submission points made by multiple others) | Delete R48 | Oppose: R48 is important in permitting discharge of stormwater to water from individual properties (including from regionally significant infrastructure sites). Requests: Disallow the submission point. |

GWC Natural Resources Plan Further submission

I would like my further submission to be accepted as I am a person representing an area of public interest.

I am the President of the Wellington Boardriders Club and my views represent Wellington surfers - an important group of stakeholders with an interest in protecting our surf breaks.

Submitter = James Whitaker

Organisation = Wellington Boardriders Club

Address =

17 Pinnacle St

Seatoun

Wellington

Phone = 021580155

Email = wellington.boardriders@gmail.com

Signed = James Whitaker (please accept this as my signature)

Details of the submission(s) I am commenting on :

1. Submitter 282: Wellington International Airport Limited.

| | |
|------------------------------|--|
| Address for contact : | Mitchell's Partnerships Ltd. PO Box 489 Dunedin, 9054 |
| Email | Claire.hunter@mitchellpartnerships.co.nz |
| CC. | greg.thomas@wlg.aero |

I oppose submitter 282 in regard to the following points:

WIAL Submission Page 5 Paragraph xi:

Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

Policy 15(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment;

Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library:

<https://natlib.govt.nz/records/23046068?search%5Bpath%5D=items&search%5Btext%5D=Lyll+Bay+1938>

“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

It should be pointed out that from case law the precedence is with respect to environmental impacts that they are assessed on, what is there today, not what it used to be like.

For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before the old structure was there, it is the impact on the existing environment.

In this case, it would mean that WIAL cannot argue that because the historic human-induced changes to Lyall Bay resulted in a high-quality surfing break, it does not have to consider it or that it has no value because it's not 'natural'. Furthermore, and most importantly, the reclamation may be manmade (i.e. not natural), however, the break that formed beside it formed naturally due to coastal processes and is an entirely natural feature in response to human intervention (it is comprised of swell, currents, water levels, seabed morphology and wind, as per Schedule 1 of the NZCPS).

Relief Sought:

- | | |
|--|--|
| Dismiss Wial's decision sought to | remove Objective 037, |
| Dismiss Wial's decision sought to | revise Schedule K of the PNRP with intent to remove the Corner surf break. |
| Dismiss Wial's decision sought to | delete P51 of the PNRP |

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and

(b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

Policy 13 Preservation of natural character

2 (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

I note that other policies in the PNRP that relate to natural features (such as 4.6.5 Natural features and landscapes and special amenity landscapes (b))refer to avoid, remedy, or mitigate.

I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by ~~minimising~~ **avoiding remedying, or mitigating** the adverse effects on:

(a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and

(b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Note:

The deletion I seek is indicated by strikethrough, the addition I seek is indicated by bold and underline

SIGNED:

*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

Please note:

All information included in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on the GWRC website and will include all personal details included in the further submission.

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Egon Guttke

ORGANISATION (* the organisation that this submission is made on behalf of)

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

6 Glengavel Grove
PORIRUA 5024

PHONE

FAX

EMAIL

egon.guttke@paradise.net.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

I own a large area of rural land, which will be affected the the proposed plan. I have submitted to the proposed plan with my submitter number being S14

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:



Date:

24/3/2016

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on Name of person/group making original submission and postal address. | Original submission number The original submission number can be found on the submitter address list. | Position Whether you support or oppose the submission. | Part(s) of the submission you support or oppose Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Reasons Why you support or oppose each submission point. | Relief sought The part or whole of each submission point you wish to be allowed or disallowed. |
|---|---|--|--|--|--|
| e.g. Joanne Bloggs 12 Pine Tree Avenue Redwood | e.g. submitter S102 | e.g. Oppose | e.g. Oppose all of submission point S102/41 | e.g. The submission point does not recognise... | e.g. Disallow the parts of S102/41 relating to... |
| Alan Smith | S35 | Support | Recommendations for re-balancing the plan to recognise private land, private property rights and economic costs of restrictions, including significant restrictions proposed on private land | For the reasons given in the submission | As sought by the submitter |
| Anna Carter | S295 | Support | Recommendations for re-balancing the plan to recognise private land, private property rights and economic costs of restrictions, including significant restrictions proposed on private land | For the reasons given in the submission | As sought by the submitter |
| Federated Farmers | S352 | | Recommendations for re-balancing the plan to recognise private land, private property rights and economic costs of restrictions, including significant restrictions proposed on private land | For the reasons given in the submission | As sought by the submitter |

Further Submission by Vector Gas Limited

**Proposed Natural Resources Plan for the Wellington
Region**

24 March 2016

Further Submission on the Proposed Natural Resources Plan for the Wellington Region under Clause 8 of Schedule 1, Resource Management Act 1991

To Greater Wellington Regional Council (Council)

Name of submitter: Vector Gas Limited (Vector)

Vector is making this further submission in accordance with Clause 8 of Schedule 1, Resource Management Act 1991.

Vector has an interest in the Proposed Natural Resources Plan ('Proposed Plan') that is greater than the interest the general public has for reasons including the following:

- Vector has an interest as a landowner and occupier in respect of existing and future infrastructure which is potentially affected (directly or indirectly) by the relevant submissions; and/or
- Vector made an original submission on matters raised or affected by those submissions.

Vector's opposition to or support for a particular submission, including the reasons for that support or opposition and the relief sought, are identified in the detailed table included in Schedule 1 (attached).

Vector wishes to be heard in support of its further submission.

Due to the specific interests of Vector it will not consider presenting a joint case with others at a hearing.

Address for service of submitter: c/- Beca Limited
PO Box 264, Taranaki Mail Centre
New Plymouth 4340

Mobile: +64 27 463 3031

Email: Hywel.Edwards@beca.com

Contact person: Hywel Edwards, Associate - Planning



.....
Signature of the person authorised to sign on behalf of Vector Gas Limited

Date: 24 March 2016

Schedule One: Further Submission by Vector Gas Ltd

| Provision Number | Provision | Submitter Name and Submission Point | Submission Summary | Support/ Oppose | Reason | Allow/Disallow |
|--------------------|--|--|---|-----------------|---|----------------------|
| Definitions | | | | | | |
| 17.00 | 2.2 Definitions | Wellington Electricity Lines Limited S126/011 | Add a new definition for 'Maintenance' as follows: <i>"Maintenance means the replacement, repair or renewal of existing infrastructure and where the effects of that utility remain the same or similar in character, intensity and scale."</i> | Support | The proposed definition will provide clarity to plan users (for rule interpretation) as to what 'maintenance' provides for and is limited to. | Allow |
| 189.00 | Definition – upgrade | Wellington Electricity Lines Limited S126/008 | Retain the definition of 'upgrade'. | Support | The proposed definition is appropriate to provide clarity to plan users (for rule interpretation) as to what 'upgrade' provides for and is limited to. | Allow |
| 261.00 | Objective 56: New development in the coastal marine area | KiwiRail Holdings Ltd S140/027 | Amend Objective O56 New development in the coastal marine area is of a scale, density and design that is compatible with its function and its location in the coastal environment. | Support | The submission recognises that some uses, notably regionally significant, may have a functional need to be located in the coastal marine area. | Allow |
| 264.10 | 4 Policies | Wellington City Council S286/006 | Remove the use of 'avoid' in the policies. | Support in part | Vector believes the word can be applied in the policy framework, but it is important to also acknowledge that remediation and mitigation also apply. In addition, some development is restricted in terms of where it can locate and that some development, such as a regionally significant infrastructure, may generate adverse effects but deliver significant positive effects to the region and beyond. Only using the term 'avoid' is an extremely high threshold test in a consenting context. | Allow in part |
| 272.00 | Policy P8: Beneficial activities | CentrePort Limited S121/043 | Amend Policy P8 as follows: ... h) maintenance, use <i>and upgrading</i> of existing structures in the coastal marine area, natural wetlands and the beds of rivers and lakes, and | Support | The relief sought is appropriate to recognise that upgrading is also a beneficial activity. | Allow |
| 277.00 | Policy P13: Existing regionally significant infrastructure and renewable electricity generation facilities | Royal Forest and Bird Protection Society S353/060 | Add the words, "provided the adverse effects are avoided remedied". | Oppose | The policy relates to recognising the benefits of regionally significant infrastructure and renewable generation activities. Other policy provisions, against which Policy 13 will be balanced, manage the effects generated by that infrastructure. | Disallow |
| 296.00 | Policy P32: Adverse effects on aquatic ecosystem health and mahinga kai | Fish and Game S308/056 | Delete Policy 32 in its entirety | Oppose | Vector considers Policy 32 is appropriate, especially in the context of regionally significant infrastructure which may generate adverse effects, but which may deliver significant positive effects. | Disallow |
| 366.00 | Policy 102: Reclamation or drainage of the beds of lakes and rivers | Fish and Game S308/069 | Delete. Reclamation or drainage of the beds of rivers and lakes should be prohibited | Oppose | Applying a prohibited activity status to reclamation or drainage of the beds of lakes and rivers is inappropriate and not consistent with effects based planning. | Disallow |
| 396.00 | Policy P132: Functional need and efficient use | Royal Forest and Bird Protection Society S353/126 | Add new provision (h) (h) adverse effects are managed in accordance with [new] Policy 41A | Oppose | The policy relates functional need and efficient use. Other policy provisions, against which Policy 132 will be balanced, manage the effects generated by use and development. | Disallow |
| 519.00 | Wetlands general conditions 5.5.2 | Minister of Conservation S75/143 | Amend the conditions: Wetland general conditions for activities in natural wetlands, (<i>including</i> significant natural wetlands and outstanding natural wetlands) are that: ... (e) in any part of the natural wetland <i>identified as</i> inanga spawning habitat identified in Schedule F4 (coastal sites) and Schedule F5 (coastal habitats), no bed disturbance, diversions of water or sediment discharge shall occur between 1 January 4 March and 31 May, and | Oppose | Vector understands the inanga spawning period to occur between 1 March and 31 May, inclusive of 'buffering' to avoid peak spawning periods. | Disallow |
| 528.00 | Beds of lakes and rivers general conditions 5.5.4 | Minister of Conservation S75/151 | Amend the conditions: (e) in any part of the river bed <i>identified as</i> inanga spawning habitat identified in Schedule F4 (coastal sites) and Schedule F5 (coastal habitats), no bed disturbance, diversions of water or | Oppose | Vector understands the inanga spawning period to occur between 1 March and 31 March, inclusive of 'buffering' to avoid peak spawning periods. | Disallow |

| | | | | | | |
|--------|--|-------------------------------------|--|---------|--|--------------|
| | | | sediment discharge shall occur between <u>1 January</u> 4 March and 31 May, and | | | |
| 529.00 | Rule R112: Maintenance, repair, replacement, upgrade or use of existing structures (excluding the Barrage Gates) - permitted activity | Wellington City Council S286/050 | Clarify whether temporary stream damming and diversion required for instream structure works (Rules 112- 118) are a covered by the rules (i.e. included in 'associated' works); If the temporary damming or diversion of water is not included, make it a permitted activity subject to appropriate conditions. | Support | The relief sought is appropriate. The Plan's rule interpretation (chapter 2) states that this approach has been sought to be adopted, where practicable. Vector considers it practicable in respect of Rule 112. | Allow |

Submitter ID:

File No:

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



Fold here

Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
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Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

Fold here

FreePost Authority Number 3156



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Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Leo Vollebregt

ORGANISATION (* the organisation that this submission is made on behalf of)

Wairarapa Water User's Inc. Society

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

235 Pahautea Road,
RD1,
Featherston
5771

PHONE

0272588405

FAX

EMAIL

lrvoll@xtra.co.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

I am Chairman of the above Society which represents users of water who are consented to do so by Greater Wgtn Regional Council

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature: Leo Vollebregt

Date: 24/03/2016

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|--|---|--|---|--|
| Name of person/ group making original submission and postal address. | The original submission number can be found on the submitter address list. | Whether you support or oppose the submission. | Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Why you support or oppose each submission point. | The part or whole of each submission point you wish to be allowed or disallowed. |
| <i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood | <i>e.g.</i> submitter S102 | <i>e.g.</i> Oppose | <i>e.g.</i> Oppose all of submission point S102/41 | <i>e.g.</i> The submission point does not recognise... | <i>e.g.</i> Disallow the parts of S102/41 relating to... |
| Federated Farmers | S352 | support | S352/180 | This point recognises that allocations and current consents were decided on based on good evidence. When new evidence comes in that is based on solid data changes can be made. | The maximum allocation amounts for rivers (and their tributaries) and directly connected groundwater ,: (a) <u>is the current operative RFP allocations, or</u> (b) <u>consented allocation at the date of notification of the pNRP</u> <u>whichever is greater</u> |
| Federated Farmers | S352 | support | S352/053 | The point makes good sense and embodies the purpose of the objectives | Amend title to "Ki uta ki tai: <u>integrated catchment management</u> " |
| Dairy NZ/Fonterra | S316 | support | S316/016 | More accurately reflects a water way's | Amend the definition to more accurately determine the mean annual low flow as the 7 day or 5 day variant in use by hydrologists: "The mean annual low flow 7D is the average of lowest daily flows recorded over a 7-day continual flow record, derived for a water year (June-July)". |
| Dairy NZ/Fonterra | S316 | support | S316/020 | Good management of waterways | Amend the definition is as follows: "A reduction in the core amount of water allocated from a river <u>when river flows are low to protect the minimum flow.</u> " |
| A.J Barton and Ongaha Farms Limited | S327 | support | S327/002,003,004 | Fits with our earlier submissions (S124/009,030,033,036,037 and 038) on Category A,B and C | That the definitions for Category A, B and C groundwater be amended to better explain the degree of hydraulic connectivity in a way that |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|--|
| | | | | groundwater | is clear, unambiguous, measurable, and workable. These definitions should assist in both clarifying the classification of a particular aquifer, and setting appropriate consent conditions to mitigate any potential adverse effects. The definitions and designation applied to 'zones' must recognise local variations, and the potential for such variations to cause significant differences in the 'expected' behaviour of the groundwater system |
| A.J Barton and Ongaha Farms Limited | S327 | support | S327/005 | Good wording supports our submission S124/004 | That a robust economic analysis be undertaken of the potential effect of the minimum flow restrictions on the abstraction of water from Category A & B aquifers where such a restriction has not previously existed Any economic analysis must recognise that the value of water for irrigation varies throughout the season, and is a function of the particular land use activity. The analysis presented in Harris (2015) should be revised to take account of the critical nature of water during certain periods |
| A.J Barton and Ongaha Farms Limited | S327 | support | S327/006 | Good wording supports our submission S124/031 | The submitter would like to see the addition of <i>"the application of most appropriate practice"</i> . |
| A.J Barton and Ongaha Farms Limited | S327 | support | S327/007, 008 | Fits with our earlier submissions (S124/009,030,033,036,037 and 038) on Category A,B and C groundwater | That the limitations of the regional scale modelling be recognised when considering resource consents. There is significant local variation, vertical differentiation, and aquifer heterogeneity which is not incorporated in the regional modelling. These factors have a significant effect on local groundwater conditions and the interaction of surface water and groundwater |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|---|
| A.J Barton and Ongaha Farms Limited | S327 | support | S327/009 | Objective data which must be part of a section 32 report | That the economic cost of the minimum flow restrictions on groundwater consents be weighed against any measurable environmental benefits |
| A.J Barton and Ongaha Farms Limited | S327 | support | S327/010 | This would acknowledge the investment made in infrastructure and gives users the confidence to invest in the future | That the four-year `grandparenting provision in Policy 118 be extended to 10-years. |
| A.J Barton and Ongaha Farms Limited | S327 | support | S327/011 | A clause that would fit in well with Method 18:water management | That a mechanism be provided for recognising and accommodating local variations in a robust, workable, and transparent manner |
| A.J Barton and Ongaha Farms Limited | S327 | support | S327/012 | The charging process needs to be discussed. The expense of consent change is onerous for the consent holder. | Rule R.R1] That while the onus for assessing the potential effects of new resource consents might justifiably lie with the applicant, the onus and costs for changing existing consents should lie with the Council, unless there are demonstrable adverse environmental effects which must be mitigated. |
| A.J Barton and Ongaha Farms Limited | S327 | support | S327/016 | Fits with our earlier submissions (S124/009,030,033,036,037 and 038) on Category A,B and C groundwater | [Rule R.R1] That the maps shown in Figures 7.8 & 7.9 of the NRP be removed. These are derived from regional scale mapping which ignores local variation in groundwater conditions. The maps are inaccurate. Presenting the maps in the NRP is misleading and will lead to pre-determination when considering resource consent applications; |
| Rangitane o Wairarapa Inc | S279 | oppose | S279/019 | Oppose the removal of this objective O8 a Community, collaborative set objective relating to allocation network. | Retain |
| Rangitane o Wairarapa Inc | S279 | Oppose | S279/062 | O52e Storage of water enhances the efficiency of water allocation. | Retain (e) |
| Rangitane o Wairarapa Inc | S279 | Oppose | S279/074 | Oppose the removal of this Policy P7 a Community, collaborative based policy on beneficial use. | Retain |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|---------------|
| Rangitane o Wairarapa Inc | S279 | Oppose | S279/142 | Oppose amendment to this P111 a Community, collaborative based policy prioritising essential water use. | Retain |
| Rangitane o Wairarapa Inc | S279 | Oppose | S279/145 | Oppose removal of this P114 a Community, collaborative based policy prioritising essential water use. | Retain |
| Rangitane o Wairarapa Inc | S279 | Oppose | S279/150 | Oppose removal of this P120 Storage of water enhances the efficiency of water allocation and further beneficial use to the region. | Retain |
| | | | | | |
| Fish and Game | S308 | Oppose | S308/046 | Oppose removal of this P7 Oppose the removal of this Policy P7 a Community, collaborative based policy on beneficial use. | Retain |
| Fish and Game | S308 | Oppose | S308/050 | Oppose removal of this P11 Storage of water enhances the efficiency of water allocation and further beneficial use to the region | Retain |
| | | | | | |
| | | | | | |

If you require more space for additional comments, please insert new rows as needed

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- *¹ I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

“I enjoy the sport of surfing, and appreciate the benefits surfing brings to the Wellington Region.”

*** Name: William Durbin**

Name of Organisation you represent:

***Address: 52 Chester Road, Tawa, Wellington**

***Phone/ Fax 0274668299**

EMAIL ADDRESS: williamjdurbin@gmail.com

¹ * red indicates details that must be filled in, make your choice by checking which red box(applies to you). You can simply accept the reason; “I enjoy the sport of surfing and appreciate the benefits surfing brings to the Wellington Region” or replace that with something else. Also, please make your choice for the 3 red boxes on page 2

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Details of the submission(s) I am commenting on :

1. Submitter 282: Wellington International Airport Limited.

Address for contact : Mitchell's Partnerships Ltd.
PO Box 489 Dunedin, 9054

Email **Claire.hunter@mitchellpartnerships.co.nz**

CC. **greg.thomas@wlg.aero**

I oppose submitter 282 in regard to the following points:

WIAL Submission Page 5 Paragraph xi:

Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

Policy 15(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal

environment;

Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library:

<https://natlib.govt.nz/records/23046068?search%5Bpath%5D=items&search%5Btext%5D=Lyall+Bay+1938>

“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

It should be pointed out that from case law the precedence is with respect to environmental impacts that they are assessed on, what is there today, not what it used to be like.

For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before the old structure was there, it is the impact on the existing environment.

In this case, it would mean that WIAL cannot argue that because the historic human-

induced changes to Lyall Bay resulted in a high-quality surfing break, it does not have to consider it or that it has no value because it's not 'natural'. Furthermore, and most importantly, the reclamation may be manmade (i.e. not natural), however, the break that formed beside it formed naturally due to coastal processes and is an entirely natural feature in response to human intervention (it is comprised of swell, currents, water levels, seabed morphology and wind, as per Schedule 1 of the NZCPS).

Relief Sought:

Dismiss Wial's decision sought to remove Objective 037,

Dismiss Wial's decision sought to revise Schedule K of the PNRP with intent to remove the Corner surf break.

Dismiss Wial's decision sought to delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and
- (b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

Policy 13 Preservation of natural character

2 (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

I note that other policies in the PNRP that relate to natural features (such as 4.6.5 Natural features and landscapes and special amenity landscapes (b))refer to avoid, remedy, or mitigate.

I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by ~~minimising~~ **avoiding remedying, or mitigating** the adverse effects on:

(a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and

(b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Note:

The deletion I seek is indicated by strikethrough, the addition I seek is indicated by bold and underline

SIGNED:

*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

Please note:

All information included in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on the GWRC website and will include all personal details included in the further submission.

PLEASE CC THIS EMAIL TO WIAL, AN OBLIGATION OF THE FURTHER SUBMISSION PROCESS:

Claire.hunter@mitchellpartnerships.co.nz

or by Post:
Wellington International Airport Ltd
c/o Mitchell Partnerships Ltd
P.O. Box 489
Dunedin 9054

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- *¹ I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked:

I enjoy the sport of surfing, and appreciate the benefits surfing brings to Lyal Bay and the Wellington Region in general.

*** Name: Aaron Sadler**

Name of Organisation you represent:

***Address: 58 Bridge Street
Rongotai, Wellington 6022**

***Phone/ Fax
021 155 3540
EMAIL ADDRESS: sadler@xtra.co.nz**

¹ * red indicates details that must be filled in, make your choice by checking which red box(applies to you). You can simply accept the reason; "I enjoy the sport of surfing and appreciate the benefits surfing brings to the Wellington Region" or replace that with something else. Also, please make your choice for the 3 red boxes on page 2

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Address for contact : Mitchell's Partnerships Ltd.
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My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

Policy 15(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse

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Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

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“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

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Relief Sought:

- | | |
|--|--|
| Dismiss Wial's decision sought to | remove Objective 037, |
| Dismiss Wial's decision sought to | revise Schedule K of the PNRP with intent to remove the Corner surf break. |
| Dismiss Wial's decision sought to | delete P51 of the PNRP |

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and
- (b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

Policy 13 Preservation of natural character

2 (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

I note that other policies in the PNRP that relate to natural features (such as 4.6.5 Natural features and landscapes and special amenity landscapes (b))refer to avoid, remedy, or mitigate.

I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by ~~minimising~~ **avoiding remedying, or mitigating** the adverse effects on:

(a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and

(b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Note:

The deletion I seek is indicated by strikethrough, the addition I seek is indicated by bold and underline

SIGNED:

*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

Please note:

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PLEASE CC THIS EMAIL TO WIAL, AN OBLIGATION OF THE FURTHER SUBMISSION
PROCESS:

Claire.hunter@mitchellpartnerships.co.nz

or by Post:
Wellington International Airport Ltd
c/o Mitchell Partnerships Ltd
P.O. Box 489
Dunedin 9054

**Further Submission on
The Greater Wellington Natural Resources Plan Review.**

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (PNRP).

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Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

By email: [**Regionalplan@gw.govt.nz**](mailto:Regionalplan@gw.govt.nz)

Or Post:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

DETAILS OF FURTHER SUBMITTER:

I am a person who has an interest in the PNRP that is greater than the interest the general public has.

*** Name:** Nicolaas Francken

Name of Organisation you represent:

***Address:** 37 Rothsay rd

I am a regular windsurfer in Lyall Bay – and I also surf there.

***Phone/ Fax**

EMAIL ADDRESS: nfrancken@gmail.com

I do not wish to be heard in support of my further submission; or

I do wish to be heard in support of my further submission; and, if so,

I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Details of the submission(s) I am commenting on :

1. Submitter 282: Wellington International Airport Limited.

I oppose submitter 282 in regard to the following points:

WIAL Submission Page 5 Paragraph xi:

Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

Policy 15(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment;

Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library:

<https://natlib.govt.nz/records/23046068?search%5Bpath%5D=items&search%5Btext%5D=Lyall+Bay+1938>

“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

It should be pointed out that from case law the precedence is with respect to environmental impacts that they are assessed on, what is there today, not what it used to be like.

For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before the old structure was there, it is the impact on the existing environment.

In this case, it would mean that WIAL cannot argue that because the historic human-induced changes to Lyall Bay resulted in a high-quality surfing break, it does not have to consider it or that it has no value because it's not 'natural'. Furthermore, and most importantly, the reclamation may be manmade (i.e. not natural), however, the break that formed beside it formed naturally due to coastal processes and is an entirely natural feature in response to human intervention (it is comprised of swell, currents, water levels, seabed morphology and wind, as per Schedule 1 of the NZCPS).

Relief Sought:

- | | |
|--|--|
| Dismiss Wial's decision sought to | remove Objective 037, |
| Dismiss Wial's decision sought to | revise Schedule K of the PNRP with intent to remove the Corner surf break. |
| Dismiss Wial's decision sought to | delete P51 of the PNRP |

Objective 037

Significant surf breaks are protected from inappropriate use and development
I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in

Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

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that contribute to significant surf breaks, and

(b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

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Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

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remedy, or mitigate.

I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

Policy P51: Significant surf breaks

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*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

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FOR OFFICE USE ONLY

Submitter ID:

File No:



greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

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Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

ORGANISATION (* the organisation that this submission is made on behalf of)

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

PHONE

FAX

EMAIL

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

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Signature:

Date:

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

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B. APPEARANCE AT HEARING

Please select from the following:

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Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|---|--|---|--|---|
| Name of person/ group making original submission and postal address. | The original submission number can be found on the submitter address list. | Whether you support or oppose the submission. | Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Why you support or oppose each submission point. | The part or whole of each submission point you wish to be allowed or disallowed. |
| <i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood | <i>e.g.</i> submitter S102 | <i>e.g.</i> Oppose | <i>e.g.</i> Oppose all of submission point S102/41 | <i>e.g.</i> The submission point does not recognise... | <i>e.g.</i> Disallow the parts of S102/41 relating to... |
| 2. Interpretation | | | | | |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council PO Box 2083 Wellington, 6140 New Zealand | S85 | Support | Support in part submission point S85/085 | CentrePort Limited is not in principle opposed to a new definition of "seawall". CentrePort's support is conditional on the wording of the definition. | Allow in part submission point S85/085 relating to a new definition of "seawall", to the extent that the proposed definition is not inconsistent with or contrary to the relief sought in CentrePort Limited's submissions on the Plan. |
| 3. Objectives | | | | | |
| Trelissick Park Group c/- 51 Heke Street, Ngaio, Wellington 6035 | S88 | Oppose | Oppose submission point S88/019 | The submission specifically seeks improved public access to the Kaiwharawhara Point area. CentrePort Limited considers specific provision is not appropriate in an Objective and prefers the relief sought in CentrePort Limited's submissions on the Plan. | Disallow in whole submission point S88/019 |
| Trelissick Park Group c/- 51 Heke Street, Ngaio, Wellington 6035 | S88 | Oppose | Oppose submission point S88/020 | The submission specifically seeks improved public access to the Kaiwharawhara Point area. | Disallow in whole submission point S88/020 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|---|
| | | | | CentrePort Limited considers specific provision is not appropriate in an Objective and prefers the relief sought in CentrePort Limited's submissions on the Plan. | |
| Trelissick Park Group c/- 51 Heke Street, Ngaio, Wellington 6035 | S88 | Oppose | Oppose submission point S88/021 | The submission specifically seeks improved public access to the Kaiwharawhara Point area. CentrePort Limited considers specific provision is not appropriate in an Objective and prefers the relief sought in CentrePort Limited's submissions on the Plan. | Disallow in whole submission point S88/021 |
| 4. Policies | | | | | |
| Trelissick Park Group c/- 51 Heke Street, Ngaio, Wellington 6035 | S88 | Oppose | Oppose submission point S88/017 | The submission seeks to protect the natural character of the Kaiwharawhara Stream and Estuary from inappropriate development. CentrePort Limited opposes this submission point on the basis that it is inconsistent with the relief sought it in its original submission on the Plan with regard to the management of the Kaiwharawhara Stream and Estuary. | Disallow in whole submission point S88/017 |
| 12. Schedules/related general submission points | | | | | |
| Royal Forest and Bird Protection Society PO Box 631 Wellington, 6140 New Zealand | S353 | Oppose | Oppose all of submission point S353/179 | CentrePort Limited opposes the extension of Schedules F4 and F5 to include sites within the coastal environment as this may constrain the use and development of CentrePort's infrastructure. | Disallow in whole submission point S353/179 |
| Wellington Civic Trust PO Box 10183 Wellington, 6143 New Zealand | S62 | Oppose | Oppose all of submission point S62/025 | CentrePort Limited does not consider it is appropriate to recognise and provide for the parts of the wharf edges and reclamation | Disallow in whole submission point S62/025 |

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|--|----------------------------|----------|---|--|---|
| | | | | edges which are currently protected under the Regional Coastal Plan as part of the sites of historic heritage values in the Proposed Plan. | |
| Wellington Civic Trust PO Box 10183 Wellington, 6143 New Zealand | S62 | Oppose | Oppose all of submission point S62/026 | CentrePort Limited considers there should be recognition of the potential conflict between the operation and maintenance of regionally significant infrastructure of the operational Port and the values of the Kaiwharawhara Stream and Estuary. CentrePort Limited also considers that until any separate planning exercise (as suggested) is undertaken that either the Kaiwharawhara Stream and Estuary be deleted from Schedule F4; or provision be made for Port related activities as discretionary activities. | Disallow in whole submission point S62/026 |
| Wellington Civic Trust PO Box 10183 Wellington, 6143 New Zealand | S62 | Oppose | Oppose all of submission point S62/027 | CentrePort Limited considers there should be recognition of the potential conflict between the operation and maintenance of regionally significant infrastructure of the operational Port and the values of the Kaiwharawhara Stream and Estuary. CentrePort Limited also considers that until any separate planning exercise (as suggested) is undertaken that either the Kaiwharawhara Stream and Estuary be deleted from Schedule F4; or provision be made for Port related activities as discretionary activities (i.e. the relief | Disallow in whole submission point S62/027 |

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|--|----------------------------|----------|---|---|---|
| | | | | sought in CentrePort's original submission on the Plan). | |
| Trelissick Park Group c/- 51 Heke Street, Ngaio, Wellington 6035 | S88 | Oppose | Oppose all of submission point S88/015 | CentrePort Limited considers there should be recognition of the potential conflict between the operation and maintenance of regionally significant infrastructure of the operational Port and the values of the Kaiwharawhara Stream and Estuary. CentrePort Limited also considers that until any separate planning exercise (as suggested) is undertaken that either the Kaiwharawhara Stream and Estuary be deleted from Schedule F4; or provision be made for Port related activities as discretionary activities (i.e. the relief sought in CentrePort's original submission on the Plan). | Disallow in whole submission point S88/015 |

If you require more space for additional comments, please insert new rows as needed

Attachment: CentrePort Limited – Further Submission

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|---------------|---|--|--|
| <p>Heritage New Zealand</p> <p>PO Box 2629 Wellington, 6140 New Zealand</p> | <p>S 94</p> | <p>Oppose</p> | <p>Oppose all of submission point S94/015</p> | <p>This submission seeks to amend Schedule E2 by adding Kings Wharf and Glasgow Wharf. CentrePort Limited, as owner of these wharves, opposes this submission as it could significantly and unduly constrain CentrePort's operations in this area.</p> | <p>Disallow in whole submission point S94/015</p> |

Submitter ID:

File No:

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

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FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Christopher Ruthe

ORGANISATION (* the organisation that this submission is made on behalf of)

Coastal Ratepayers United Inc.

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

199 Manly Street
Paraparaumu Beach 5032

PHONE

04 904 4144

FAX

EMAIL

christopherruthe@gmail.com

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

CRU is an incorporated society with members affected by the provisions in the PNRP.

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Signature: C.B. Ruthe

Date: 28/3/16

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

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| <i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood | <i>e.g.</i> submitter S102 | <i>e.g.</i> Oppose | <i>e.g.</i> Oppose all of submission point S102/41 | <i>e.g.</i> The submission point does not recognise... | <i>e.g.</i> Disallow the parts of S102/41 relating to... |
| Minister of Conservation RMA Shared Services Department of Conservation Private Bag 3072 Hamilton 3240 Attn: Rachel Penney | Submitter S75 | Oppose | Statement of support for Objectives 19 – 22, and amendments to incorporate new Natural Hazards Objectives: “In areas potentially affected by coastal hazards ... are avoided” (page 7 of S75) | As discussed in S93 we oppose these Objectives and the definition of “coastal hazards” (all being inconsistent with the NZCPS 2010) and seek their substitution by an objective and definition that mirrors the NZCPS 2010 provisions. In the case of the amendment proposed in S75, this is much wider than Policy 25 NZCPS 2010. Policies 25(a) and (b) deal with <i>avoiding increasing risk of harm/adverse effects</i> under specific conditions and this is narrower than avoiding increases in risk, residue risk, and adverse effects. In particular the injunction to avoid “increases in ... adverse effects” leaves no room for risk or cost/benefit analysis in the decision making. Policies 25(c) – (f) only refers to “encourage”, “discourage” and “consider”, so the injunction to | Disallow and replace these Objectives as per S93 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
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| | | | | <p>avoid is not supported by these Policies.</p> <p>The matters relating to climate change are completely new. The likely effects of climate change are incorporated in the definition of <i>coastal hazards</i> and need no further consideration here (“areas potentially affected by coastal hazards” having been identified pursuant to Policy 24).</p> | |
| ditto | ditto | Oppose | Statement of support for Objective 53 as drafted citing Policy 6(2)(c) & (d) of the NZCPS (page 9). | As discussed in S93 Policy 6(2)(d) states “activities that do not have a functional need for location in the coastal marine area <u>generally</u> should not be located there” [emphasis added]. The Objective goes beyond this. Policy 27 of the NZCPS specially deals with managing risks that might arise in areas of significant existing development. | Disallow and revise Objective 53 to incorporate an appropriate modifier. |
| ditto | ditto | Oppose | Statement of support for Objective 56 as drafted (page 10). | As discussed in S93 the test for “appropriateness” doesn’t include consideration of the development’s purpose. | Disallow and revise Objective 56 to include purpose as a consideration. |
| ditto | ditto | Oppose | Statement of support for Policy 3 citing Policy 3 NZCPS (page 10). | S93 sets out the various problems with this Policy given the NZCPS, and DoC’s own guidance on the matter. | Disallow and revise the Policy as per S93. |
| ditto | ditto | Oppose | Statement of support for how minimisation will be carried out under Policy 4 (page 10). | As pointed out in S93 Policy 4(b) will not always be possible or required under the RMA. | Disallow and add a qualification to Policy 4(b) to include a community well-being test. |
| ditto | ditto | Oppose | Statement of support for Policy 24 citing Policy 13(a) NZCPS. Statement of support for | In both cases S93 sets out how this Policy fails to give effect to Policy 13 NZCPS (areas have not been identified, and the requirements to “preserve” and “avoid” is not | Disallow and delete both Policy 24 and 25 or revise so they give effect to NZCPS. |

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| | | | Policy 25 with amendment to Policy 25(d) citing Policy 13(b) NZCPS (page 11) (page 11). | consistent with the NZCPS). | |
| ditto | ditto | Oppose to the extent that support is given to these Policies. | Statement of support for Policies 26 – 30, with amendments to Policies 27 (100 years), 29 (not increasing risk and 100 years) and 30 (consistency with Policy 26 NZCPS). | These Policies fail to give effect to the risk based approach required under the NZCPS (see pages 25 – 26 S93). | Disallow and delete and replace Policies 26-30 as per S93. |
| ditto | ditto | Oppose apart from the proposal to manage effects. | Statement of support for Polices 39 - 43, and amendments to strengthen and add to Policy 41 (page 14 -16). | These Policies either prevent appropriate activities in the areas specified (that are widely drawn) or make obtaining consent unreasonably difficult or both (see page 26 S93). In part the suggested additional Policy seeks to manage the effects rather than areas and thereby limit Policy 41. This still leaves the other issue raised in S93. | Disallow and revise the Policies so they are less extreme and focus on the attributes that create the value. |
| ditto | ditto | Oppose | Statement of support for Policy 132 on the basis of consistency with NZCPS (page 21). | The Policy is inconsistent and overall directive (see page 29 S93). | Disallow and revise the Policy. |
| ditto | ditto | Oppose | Statement of support for Policy 138 extended to give effect to Policy 11 NZCPS (page 210). | The Policy is too extreme in terms of coverage and of the NZCPS in excluding consideration of both the management of effects or alternatives (see page 30 S93) | Disallow and revise the Policy. |
| ditto | ditto | Oppose apart from the proposal to manage effects. | Statement of support for Policy 139 amended to avoid adverse effects in terms of Policy 27 (3) NZCPS (page 21). | The Policy is not able to be rescued by the proposed amendment as discussed in S93 (page 30). | Disallow and delete Policy completely and replace with a Policy giving effect to Policy 27 NZCPs in full. |
| ditto | ditto | Oppose support to retain Policy | Statement of support for Policies 143 and 145 with some amendments. | S93 (pages 30 -31) set out problems with both these policies. | Disallow and revise the Policies. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|---|--|---|--|
| ditto | ditto | Oppose general support for the proposed Rules, Methods and Schedules. | Statement of support for Rules, Methods and Schedules (pages 21 – 38) that are otherwise recommended for deletion or amendment in S93. | S93 sets out a large number of concerns about the Objectives and Policies (addressed in detail above) and some significant across-the-board issues (e.g. risk management). These all impact on the Rules, Methods and Schedules leading CRU oppose all of Chapter 5 unless where support is expressed, and to seek amendments to Chapter 6. A number of the Schedules also require changes. Accordingly S75's general statements of support for these is opposed. | Disallow support and any related proposed amendments |
| | | | | | |
| | | | | | |
| | | | | | |

If you require more space for additional comments, please insert new rows as needed

Further Submission on The Greater Wellington Natural Resources Plan Review.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (PNRP).

All sections of this form need to be completed for the submission to be accepted.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

By email: Regionalplan@gw.govt.nz

Or Post:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

DETAILS OF FURTHER SUBMITTER:

- *¹ I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

* **Name:**

Name of Organisation you represent: Richard Maher

***Address:** 62 Frobisher Street, Island Bay, Wellington 6023

***Phone/ Fax** 02102409966

EMAIL ADDRESS: Richard.maher@gmail.com

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

¹ * red indicates details that must be filled in, make your choice by checking which red box(applies to you

Details of the submission(s) I am commenting on :

1. Submitter 282: Wellington International Airport Limited.

Address for contact : Mitchell's Partnerships Ltd.
PO Box 489 Dunedin, 9054
Email Claire.hunter@mitchellpartnerships.co.nz
CC. greg.thomas@wlg.aero

I oppose submitter 282 in regard to the following points:

WIAL Submission Page 5 Paragraph xi:

Schedule K relating to surf breaks seeks to preserve the natural character of the coastal marine area by protecting (Objective 037, Policy P51) surf breaks. However the schedule includes surf breaks that have been significantly affected by the modification of the environment in Lyall Bay and are therefore not representative of the natural character of the coastal marine area. WIAL also notes that the Proposed Plan provides little scope for the mitigation of effects on surf breaks. Furthermore, WIAL queries the reason for elevating surfing above other recreational values, when the NZCPS (Policy 6) seeks more broadly to maintain and enhance the public open space and recreation qualities and values of the coastal marine area. WIAL also notes that there is no higher level directive within the Wellington Regional Policy Statement to require the specific protection of surf breaks at a regional level, WIAL considers that the Proposed Plan inappropriately extends a level of protection to regionally significant surf breaks that would be more commensurate with the management of surf breaks of national significance, and is therefore contrary to, and does not give effect to, the NZCPS Policy 16.

My Response:

As a longtime, avid surfer in my late 30's, and having lived in Ireland, France, USA, and travelled extensively, in my opinion, the Corner surf break is a fantastic, unique recreational resource, enjoyed by many and a highlight of the Wellington surf coast due to its consistency, quality, accessibility and location to the city. Accordingly, it should be protected.

I surf the Corner surf break regularly, before work and on weekends. I feel very lucky to work in a city as a Software Solution Architect and yet still have access to a wonderful recreational activity such as surfing the Corner surf break. Having lived and worked in IT around the world and originally from Ireland (arriving in Wellington in 2008), I have yet to find such great balance in city work life and surfing. Access to surfing on the Wellington coast was one of the factors for me choosing to live in Wellington.

Unfortunately, the Corner surf break is somewhat unique in Wellington in that it is regularly producing ride-able waves when other spots are not (e.g. Lyall Bay Beach, Houghton Bay, Breaker Bay, Island Bay). This is not unlike a "Single Point of Failure" that is a common failure in Software design. Accordingly, any activity that adversely affects the Corner surf break could reduce the number of surf-able Wellington days in the year for me and others.

Surfing is a

1. great stress relief,
2. it keeps me in shape,
3. it allows me to appreciate nature and protecting my environment
4. and above all its fun.

To reduce the number of surf-able Wellington days, would have a negative affect on my and others well being and would adversely affect the recreational enjoyment of the Wellington coast.

WIAL have failed to recognise that regional surf breaks are protected under Policies 13 and 15 of the New Zealand Coastal Policy Statement, these policies give direction to territorial authorities to provide identification and protection for their regional surf breaks, as surf breaks are recognised as elements of Natural Features along with natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; Policy 13(2)(c) and;

Policy 15(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment;

Where Policy 15(c) gives direction on methods by which to avoid, remedy or mitigate effects on these identified natural features.

WIAL Submission Annexure A, page 8, Objective 037

Significant surf breaks are protected from inappropriate use and development

I oppose Wial's decision sought deletion of Objective 037

I seek that Objective 037 is kept in the PNRP.

I oppose WIAL's decision sought that Schedule K of the PNRP be revised, with the intent that the Corner Surf break be removed from the schedule.

WIAL Submission Annexure A, page 25 : Policy P51 Significant Surf breaks

I oppose WIAL's decision sought to delete Policy P51

Reason

WIAL assert that the Corner surf break is not a natural feature, as without the airport, the Corner surf break would not exist in its current form.

The Corner Surf break is a natural reaction to the airport. A number of senior surfers note that there was a surfbreak in the part of Lyall Bay that has been reclaimed for the airport, a right hander. Evidence of this can be viewed at the Alexander Turnbull Library:

<https://natlib.govt.nz/records/23046068?search%5Bpath%5D=items&search%5Btext%5D=Lyall+Bay+1938>

“WIAL questions how Policy P51 would work in regard to these scheduled surf spots which have been enhanced by human-induced modification. If it is intended to only protect naturally occurring surf breaks, the schedule would have to be revised to reflect this.”

It should be pointed out that from case law the precedence is with respect to environmental impacts that they are assessed on, what is there today, not what it used to be like.

For example, replacing an old causeway with a bridge, you must consider the impacts on the environment as it is with the causeway, not as it is without the old causeway before it was constructed; the same with replacing a coastal protection structure for a new one; it's not about how the new structure would impact on the environment before the old structure was there, it is the impact on the existing environment.

In this case, it would mean that WIAL cannot argue that because the historic human-induced changes to Lyall Bay resulted in a high-quality surfing break, it does not have to consider it or that it has no value because it's not 'natural'. Furthermore, and most importantly, the reclamation may be manmade (i.e. not natural), however, the break that formed beside it formed naturally due to coastal processes and is an entirely natural feature in response to human intervention (it is comprised of swell, currents, water levels, seabed morphology and wind, as per Schedule 1 of the NZCPS).

Relief Sought:

Dismiss Wial's decision sought to remove Objective 037,

Dismiss Wial's decision sought to revise Schedule K of the PNRP with intent to remove the Corner surf break.

Dismiss Wial's decision sought to delete P51 of the PNRP

Objective 037

Significant surf breaks are protected from inappropriate use and development

I support the inclusion of this objective in the PNRP.

Policy P51

I support in part Policy p51

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by **minimising** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and
- (b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Reason

Policy P51 is inconsistent with The New Zealand Coastal Policy Statement and other policies in PNRP that refer to Natural Features.

Both Policy 13 and 15 note that adverse effects must be avoided, remedied, or mitigated. Policy 13 describes the range of natural features that these policies recognise:

Policy 13 Preservation of natural character

- 2 (c)** natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

Policy P51 of the GWRC PNRP uses the word **minimising** which lends far less weight than avoid remedy or mitigate.

I note that other policies in the PNRP that relate to natural features (such as 4.6.5 Natural features and landscapes and special amenity landscapes (b))refer to avoid, remedy, or mitigate.

I question why out of all natural features, surf breaks are singled out for lessor protection?

Decision Sought: Change Policy P51 to read as:

Policy P51: Significant surf breaks

Use and development in and adjacent to the significant surf breaks identified in Schedule K (surf breaks) shall be managed by ~~minimising~~ **avoiding remedying, or mitigating** the adverse effects on:

- (a) natural processes, currents, seabed morphology and swell corridors that contribute to significant surf breaks, and

(b) access to significant surf breaks within the coastal marine area, on a permanent or ongoing basis.

Note:

The deletion I seek is indicated by strikethrough, the addition I seek is indicated by bold and underline

SIGNED:

*Signature of person making further or person authorised to sign on behalf of person making further submission. **A signature is not required if you make your submission by electronic means.***

Please note:

All information included in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on the GWRC website and will include all personal details included in the further submission.

**RESOURCE MANAGEMENT ACT 1991
SUBMISSION ON WELLINGTON PROPOSED NATURAL RESOURCES PLAN**

To: Greater Wellington Regional Council

From: Royal Forest and Bird Protection Society of New Zealand Inc (Forest & Bird)

Address for service:

Forest and Bird
P O Box 631
Wellington 6140
Attention: Amelia Geary



This is a further submission in support of, or in opposition to, submissions on the Proposed Natural Resources Plan for the Greater Wellington Region, pursuant to Clause 8 of Schedule 1 of the Resource Management Act 1991.

Forest and Bird represents relevant aspects of the public interest. Forest and Bird is New Zealand largest and oldest conservation organisation and represents more than 70,000 members and supporters who have an interest in the sustainable management and protection of New Zealand's indigenous biodiversity, natural landscapes, recreational access and enjoyment to the coastal marine area, and to publicly owned land, and rivers and lakes.

We could not gain an advantage in trade competition through this submission.

Forest and Bird wishes to be heard in support of our submission.

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| Minister of Conservation RMA Shared Services Department of Conservation Private Bag 3072 Hamilton 3240 Attn.: Rachel Penney | S75 | Support | We support the entire submission except where points are in conflict with Forest & Bird's original submission, in which case our submission takes precedence. | The submission is generally in alignment with all relevant legislation and policy documents. | Allow entire submission where not in direct conflict with Forest & Bird's original submission. |
| Ian Benge and Martin Benge 6 Holmwood Road Merivale Christchurch 8014 | S83 | Oppose | Submission Point 1 | P102(c) This policy is inappropriate given the potential implications for Taupō Swamp from large scale catchment modification with suburban development associated with the northern growth area. R127 This rule is inappropriate. The damming or reclamation of outstanding water bodies should be prohibited. | Disallow whole submission point. |
| | S83 | Oppose | Submission Point 2 | It is highly inappropriate to exclude streams that are located within the Plimmerton Farm site from Schedule F1. | Disallow whole submission point. |
| Environmental Defence Society Incorporated P.O. Box 91736 Victoria Street West Auckland 1042 Attn: Madeleine Wright | S110 | Support | General submissions 1-3 | Regional plans must give effect to the New Zealand Coastal Policy Statement 2010 and the National Policy Statement Freshwater Management 2014. | Allow all three submission points. |
| | S110 | Support | Section 2.2 definition of "Biodiversity offsets" | The definition aligns with international best practise. | Allow submission point. |
| Wairarapa Regional Irrigation Trust 316 Queen Street P.O. Box 920 Masterton 5840 Attn: Geoff Copps | S127 | Oppose | We oppose the proposed addition of a new policy in Section 4.9 (Policies P107 to p127) Water Allocation policies and the new Definition proposed for Section 2.2. | These proposed additions are inconsistent with the purposes of the RMA. | Disallow whole submission point. |
| Kiwi Rail Holdings Limited P.O. Box 593 Wellington 6140 Attn: Rebecca Beals | S140 | Oppose | We oppose the inclusion of the wording "where values have been compromised" regarding Objectives O33 and O35. | This wording adds subjectivity and does not add clarity to the plan. | Disallow submission points 22 and 23. |
| | | Oppose | We oppose the amendment to Rule 127. | This amendment is incompatible with the RMA. | Disallow submission point 61. |
| NZ Transport Agency P.O. Box 5084 Lambton Quay Wellington 6145 Attn: Caroline Horrox | S146 | Support | We support the inclusion of a definition of marine coastal area in section 2.2 Definitions in accordance with s2 of the RMA. | This is an appropriate definition in a regional plan. | Support submission point to include a definition of marine coastal area. |
| | | Oppose | We opposed the additional wording "to | This wording does not add clarity to the | Disallow the additional wording proposed in |

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| | | | the extent practicable” in Policy 73, 78, 89, 97. | plan. | said policies. |
| | | Oppose | We oppose the proposed rewording of Policy P102: Reclamation or drainage of the beds of lakes and rivers. | This policy is inappropriate. Insofar as this further submission is inconsistent with our original submission, this further submission takes priority. | Disallow whole submission point. |
| | | Oppose | We oppose the inclusion of reclamation as a discretionary activity in regard to Rule R107 activities in natural wetlands and significant natural wetlands. | Reclamation is inconsistent with s6 of the RMA and this clause hasn't been properly considered with regard to the provisions of the NZCPS. | Disallow whole submission point. |
| Queen Elizabeth II National Trust P.O. Box 3341 Level 4 138 The Terrace Wellington 6140 | S157 | Support | We support QEII National Trust's request to have the status of Taupō Swamp Complex elevated from Significant to Outstanding. | The Wildlands report attached to QEII National Trust's submission provides adequate evidence that Taupō Swamp is an Outstanding Wetland. | Include Taupō Swamp Complex in Schedule A3. |
| Porirua City Council P.O. Box 50-218 16 Cobham Court Porirua 5240 Attn: Harriet Shelton | S163 | Oppose | Policy P102: Reclamation or drainage of the beds of lakes and rivers. | This policy is inappropriate given the potential implications for Taupō Swamp from large scale catchment modification with suburban development associated with the northern growth area. Insofar as this further submission is inconsistent with our original submission, this further submission takes priority. | Disallow whole submission point. |
| Irrigation New Zealand Incorporated P.O. Box 69119 Lincoln Christchurch 7640 | S306 | Oppose | We oppose this submission in its entirety. | The proposed submission is inconsistent with the purposes of the RMA. | Disallow whole submission. |
| Fish and Game P.O. Box 1325 Palmerston North 4440 | S308 | Support | We support the entire submission except where points are in conflict with Forest & Bird's original submission, in which case our submission takes precedence. | The submission is generally in alignment with all relevant legislation and policy documents. | Allow entire submission where not in direct conflict with Forest & Bird's original submission. |
| Dairy NZ and Fonterra Co-operative Group Ltd P.O. Box 10002 Wellington 6143 Attn: Oliver Parsons | S316 | Oppose | We oppose this submission in its entirety. | The proposed submission is inconsistent with the purposes of the RMA. | Disallow whole submission. |
| Federated Farmers of New Zealand P.O. Box 715 Wellington 6140 Attn: Elizabeth McGruddy | S352 | Oppose | We oppose the additional wording in the definition of vegetation clearance pg 27. | We consider the words “regenerating scrub” to be subjective. | Disallow the additional wording “For the purposes of rule R100...” and/or include a further definition for ‘Regenerating scrub’. |
| | | Oppose | We oppose the proposed amendment to O44 to manage land use activities through a non-regulatory programme. | We consider this to be highly inappropriate and inconsistent with s6(c) of the RMA. | Disallow whole submission point pertaining to O44. |
| | | Oppose | We oppose the proposed amendment to | This inconsistent with the RMA, | Disallow whole submission point pertaining |

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|--|------|--------|--|--|--|
| | | | O45. | including Part 2 and section 30. | to O45. |
| | | Oppose | We oppose the proposed amendments to O52. | Water storage should not be enabled regardless of environmental impact, instead sustainable land use practices that don't rely on water storage must be investigated and promoted. | Disallow whole submission point pertaining to O52. |
| | | Oppose | We oppose the proposed amendments to P4. | This policy should be deleted as it does not meet the requirements of the RMA | Disallow whole submission point pertaining to P4. |
| | | Oppose | We oppose the new policies for 'Primary production' and 'Irrigation' | We do not consider these to be beneficial use or development. | Disallow proposed new policies for 'Primary production' and 'Irrigation' |
| | | Oppose | We oppose the proposed amendments to R83. | These amendments do not meet the purposes of the RMA. | Disallow whole submission point pertaining to R83. |
| | | Oppose | We oppose the proposed amendments to R94. | The proposed amendments make the Rule incompatible with the RMA. | Disallow whole submission point pertaining to R94. |
| | | Oppose | We oppose the proposed amendments to R108. | The proposed activities on natural and significant natural wetlands should be non-complying activities. | Disallow whole submission point pertaining to R108. |
| | | Oppose | We oppose the proposed deletion of R109, R110, R111. | These rules should be amended, not deleted. | Disallow submission points pertaining to R109, R110, R111. |
| | | Oppose | We oppose the proposed deletion of point (f) of R136. | Metering if water is important if landowners are to stay within the daily water limit. | Disallow submission point pertaining to point (f) of R136. |
| NZ Pork P.O. Box 4048 Wellington 6140 Attn: Anita Murrell | S359 | Oppose | We oppose the submission point pertaining to Rule 83. | Discharge of collected animal effluent to land from existing farming activities should be a controlled activity. | Disallow submission point pertaining to Rule 83. |

Signed



Amelia Geary

Regional Conservation Manager – Lower North Island

24 March 2016

Erin Campbell

From: Alana Bowman <alana.bowman@mac.com>
Sent: Tuesday, 29 March 2016 11:29 a.m.
To: Regional Plan
Subject: Further Submission

Follow Up Flag: Follow up
Flag Status: Flagged

Alana Bowman S129
PO Box 24332
Wellington 6142

04 384 4324

alana.bowman@mac.com

I am a person who has an interest in the PNRP that is greater than the interest the general public has.

I have an interest in a boatshed at Pauatahanui Inlet.

I would like to speak to my submission.

I am commenting on S121/140.

I oppose the proposal by Centreport opposing the historical status for the Railway, Waterloo Quay and Miramar Wharves.

These wharves retain on-going historical and social value and should receive the highest level of protection available.

Signed

Alana Bowman

29/3/16

I will send a copy of this submission to the submitter on behalf of Centreport:

William Woods
PO Box 794

Hiinemoa Street
Wellington 6140

Submitter ID:

File No:



greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

Fold here

FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Charles Yates Grant

ORGANISATION (* the organisation that this submission is made on behalf of)

KRL Developments Limited

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

PO Box 577
Wanaka 9343

PHONE

0274314089

FAX

None

EMAIL

landgroup@xtra.co.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

KRL Developments Ltd have an interest in a property at 182 Te Hapua Road Otaki and have for some time been considering development of that land into a Residential Hamlet under the District Council rules. In the course of studies and investigations for that, certain inadequacies and inconsistencies have been identified in the Proposed Natural Resources Plan.

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature: C Y Grant

Date: 29/03/16

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|--|---|--|---|--|
| Name of person/ group making original submission and postal address. | The original submission number can be found on the submitter address list. | Whether you support or oppose the submission. | Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Why you support or oppose each submission point. | The part or whole of each submission point you wish to be allowed or disallowed. |
| <i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood | <i>e.g.</i> submitter S102 | <i>e.g.</i> Oppose | <i>e.g.</i> Oppose all of submission point S102/41 | <i>e.g.</i> The submission point does not recognise... | <i>e.g.</i> Disallow the parts of S102/41 relating to... |
| Porirua City Council PO Box 50218, Porirua | 163/117 | Support | Whole submission | Agree that requiring two separate applications is unreasonable and unnecessary. | Allow the relief sought by the Submitter |
| | 163/ 119 | Support | Relief Sought | There are often situations where minor encroachments may be appropriate into the margins of defined wetland areas , especially given that the definition of the boundaries of wetland designations are not always precise and the mapping methodology uses lines which in ground terms are some metres thick. A prohibited activity status is a blunt instrument. | Allow the relief sought by the Submitter |
| | | | | | |
| Waa Rata Estate 149 Terrace Road Waikanae RD1 Kapiti Coast | 152/002 | Support | Whole Submission | The concept of Restoration Management Plans is supported, however the process currently proposed in the plan (Rule 106, Schedule F3a and definitions) is poorly defined and cumbersome. | Allow the relief sought by the Submitter by amending and consolidating the following: Rule106; Schedule F3a and the Definition of a Restoration Management Plan. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|------------------------------------|--|--|---|
| | | | | Two approval processes are required and who has responsibility for preparation and approval of the plans is vague. The end result is likely to be a low implementation rate. | |
| | 152/080 | Support | Part related to Rule106 | Similar reasoning to 152/02 above | Allow the relief sought by the Submitter |
| | | | | | |
| Royal Forest and Bird Protection Society of New Zealand. PO Box 631 Wellington 6140 | 353/143 | Oppose | Whole Submission | The submitter requests Rules 104-106 be retained. As per other cross submissions KRL is supporting submissions have requested that Rule 106 be modified | Disallow in so far as the rules be modified in accordance with the changes outlined in other cross submissions. |
| | 353/147 | Support in part/ Oppose in part | Support with respect to highlighting an issue with the drafting of Rule 111and what is a reclamation, but oppose the relief sought | The submitter correctly highlights a problem with the term “reclamation” as it is used in Rule 111. This problem is further confused by referencing the Definitions in Section 2.2 where the definition of Reclamation provided is specific to the coastal marine area. Rule 111 on the other hand is specific to “Outstanding Natural Wetlands”, unlikely to occur in the Coastal Marine Area. The relief sought by the submitter retains the word reclamation and is too broad as any activity whatsoever has the potential to “change the characteristics of a wetland” | Delete the word reclamation and replace with the actual activities that are prohibited. |
| | | | | | |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| Maypole Environmental Ltd PO Box 10-283 Wellington | 143/015 | Support | Whole Submission | Highlights shortcomings in the Proposed Plan with respect to Wetland Management Plans | Allow the relief sought by the Submitter |
| | 143/016 | Support | Whole Submission | Highlights shortcomings in the Proposed Plan with respect to Wetland Management Plans | Allow the relief sought by the Submitter |
| | | | | | |
| Minister of Conservation RMA Shared Services Private Bag 3072 Hamilton 3240 | 75/145 | Oppose | The relief sought,...” to retain as notified”. | Conflicts with modifications requested to Rule 106. | Disallow in so far as the rule be modified in accordance with the changes outlined in other cross submissions. |
| | 75/150 | Oppose | The relief sought,...” to retain as notified.” | Conflicts with modifications requested to Rule 111. | Disallow in so far as the rule be modified in accordance with the changes outlined in other cross submissions. |
| | | | | | |
| Ian Jensen 182 Te Hapua Road Otaki | 176/019 | Support | Whole Submission | Access is fundamental to being able to manage and restore wetlands. | Allow. The new rule could potentially form part of a modified Rule 106. |
| | 176/020 | Support | Whole Submission | Highlights shortcomings in the Proposed Plan with respect to the potential content of, the preparation and approval of Wetland Management Plans. | Allow the relief sought by the Submitter. |
| | | | | | |
| Federated Farmers of New Zealand. PO Box 715 Wellington 6140 | 352/269 | Support | Whole Submission | Highlights shortcomings in the process used for the identification of outstanding water bodies | Allow the relief sought by the submitter |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---------|---------------|
|---|----------------------------|----------|---|---------|---------------|

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If you require more space for additional comments, please insert new rows as needed

FURTHER SUBMISSION ON PROPOSED NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION

(Closing date: 5pm Tuesday 29 March 2016)

To: Chief Executive Officer
Greater Wellington Regional Council
P O Box 11646
Wellington 6142

Further Submission on: Proposed Natural Resources Plan for the Wellington Region
(proposed NRP))

Name of Submitter: Ravensdown Limited.

Address of Submitter: C/- CHC Ltd
PO Box 51-282
Tawa
WELLINGTON 5249
Attention: Chris Hansen

Phone: 021 026 45 108
Email: Chris@rmaexpert.co.nz

1. A detailed further submission is attached.
2. Ravensdown Limited (Ravensdown) is an organisation who has an interest in the proposed NRP that is greater than the interest the general public has.
3. Ravensdown wishes to be heard in support of this further submission.
4. Ravensdown would be prepared to consider presenting its submission(s) in a joint case with others making a similar submission at any hearing.



.....
Chris Hansen
Authorised Agent of Ravensdown Limited
29 March 2016
.....

Date

| Submitter ID/ Name | Point ID | Plan Provision/Relief Sought | Support/ Oppose | Reason |
|--|----------------------|---|----------------------------|--|
| Horticulture NZ Federated Farmers of NZ | S307/006 S352/028 | Definition: Good Management Practice The submitters seek amendments to the definition of Good Management Practice | Support | Ravensdown supports the amendment to the definition of Good Management Practice sought by the submitters as they are consistent with the amendments it sought in its own submission, and is clear and accurate. |
| Environmental Defence Society | S110/003 | 2 Interpretation: Definition of the term Mitigation The submitter requests a new definition 'mitigation'. | Oppose | Ravensdown opposes the new definition of 'mitigation' proposed by the submitter, and in particular the use of the term 'abatement'. Ravensdown considers the definition is unnecessary and inappropriate. |
| Federated Farmers of NZ | S352/065 | 3.2 Beneficial use and development The submitter seeks a new objective: <i>"The social, economic, cultural and environmental benefits of primary production, manufacturing and processing activities are recognised and provided for."</i> | Support | Ravensdown supports the new objective sought by the submitter as it is considered to be appropriate and provides guidance to the decision maker and plan user, and is consistent with the intent of the RMA. |
| Fish & Game | S308/024 | Section 3.5 Water Quality The submitter seeks an amendment to objective, policies and rules to so that numerical water quality and quantity limits and standards are included which ensure that the life supporting capacity and ecosystem health and processes, cultural, primary recreation, the habitat of trout are protected, and that land use activities are managed to achieve these freshwater objectives/standards/ targets over time. | Oppose | Ravensdown supports the current approach taken in the plan and the intention to introduce limits through plan changes to Whaitua areas in the future. Ravensdown opposes the amendments sought as they are considered inappropriate and unnecessary. |

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| Fish & Game | S308/012 | <p>Section 3.5 Water Quality</p> <p>The submitter seeks objectives policies and standards and where applicable rules which recognise and protect regional sports fish and gamebird populations and their habitats, and which recognise and provide for recreational hunting and angling.</p> <p>The submitter also seeks numerical and narrative freshwater objectives/standards/limits/targets which protect the life supporting capacity, ecological health and processes of freshwater and which provide for recreational sports fish species and which provide for primary contact recreation of freshwater environments.</p> | Oppose in part | Ravensdown opposes plan provisions that protect regional sport fish and gamebird populations and their habitats and provide recreational hunting and angling at the expense of other resource uses that have economic and social wellbeing. Ravensdown also opposes the introduction of limits with the sole purpose of protecting areas for sports fish species. It is considered the current proposed NRP provisions provide appropriate provisions to protect habitats for their values, of which sports fish and recreational activities may benefit from, and the provisions sought by the submitter are not necessary or appropriate. |
| Horticulture NZ Federated Farmers of NZ Dairy NZ & Fonterra Co-operative Group Ltd | S307/017 S352/073 S316/031 | <p>Objective 023</p> <p>The submitters seek an amendment to the objective that reads: “<i>The overall quality of water</i>”</p> | Support | Ravensdown supports the amendment requested by the submitters as it provides direction to the decision maker and plan user of the intent of the proposed NRP provisions. |
| Fish & Game | S308/033 | <p>Section 3.9 Soil</p> <p>The submitter seeks a new objective which ensures hill country land uses, intensive farming, horticulture, cropping and plantation forestry are regulated to good management practice and output based standards which avoid discharges of sediment to freshwater habitats.</p> | Oppose | Ravensdown opposes the request for a new objective as the proposed NRP provides an interim step before catchment regulations are introduced as part of the Whaitua process and it is more appropriate an objective seeking these outcomes are introduced then. Also, the proposed NRP already includes policies requiring good management practices. |
| Horticulture NZ | S307/024 | <p>Objective 042</p> <p>The submitter seeks an amendment to read: “<i>The life supporting capacity of soils is maintained</i>”</p> | Support | Ravensdown supports the amendment sought by the submitter as an alternative to its own submission request. It is considered the amendment provides direction to the decision maker and plan user of the intent of the proposed NRP provisions. |

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| Horticulture NZ | S307/026 | Objective 044 The submitter seeks an amendment to read: <i>“Land use activities will take all reasonable steps to avoid, remedy or mitigate adverse effects on soil and water.”</i> | Support | Ravensdown supports the amendment sought by the submitter as an alternative to its own submission request. It is considered the amendment provides direction to the decision maker and plan user of the intent of the proposed NRP provisions. |
| Horticulture NZ | S307/027 | Objective 0046 The submitter seeks an amendment to read: <i>“Discharges to land are managed to reduce the <u>potential</u> for runoff or leaching of contaminants to water.”</i> | Support | Ravensdown supports the amendment sought by the submitter as an alternative to its own submission request. It is considered the amendment is appropriate and necessary. |
| Horticulture NZ | S307/028 | Objective 047 The submitter seeks an amendment to read: <i>“Minimise potential for sediment laden run off to water where current levels are elevated.”</i> | Support | Ravensdown supports the amendment sought by the submitter as an alternative to its own submission request. It is considered the amendment provides direction to the decision maker and plan user of the intent of the proposed NRP provisions. |
| Horticulture NZ | S307/030 | Policy P1 The submitter seeks an amendment to the policy by adding <i>“f) use of good management practices.”</i> | Support | Ravensdown supports the amendment sought by the submitter as it provides direction to the decision maker and plan user of the intent of the proposed NRP provisions. |
| Horticulture NZ | S307/031 | Policy P4 The submitter seeks an amendment to the policy by adding <i>“Where minimisation of adverse effects is required by the policies in the Plan minimisation means taking all reasonable steps to reduce adverse effects of the activity and includes:”</i> | Support | Ravensdown supports the amendment sought by the submitter as it provides direction to the decision maker and plan user of the intent of the proposed NRP provisions. |
| Fish & Game | S308/043 | Policy P4 The submitter seeks Policy P4 be deleted and with a policy that seeks a long list of outcomes. | Oppose | Ravensdown opposes the submitters request as it supports the overall intent of Policy P4 included in the proposed NRP as it provides appropriate guidance to the decision maker and plan user. It is not considered necessary or appropriate to delete the policy and replace it with a list of outcomes sought by the submitter that in most cases require |

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| | | | | avoidance of adverse effects, rather than managing them to acceptable levels. |
| Horticulture NZ | S307/032 | Policy P7 The submitter seeks an amendment to the policy by adding to l) <u>primary</u> production, and by adding to the end of the policy: ' <i>...shall be recognised and provided for....</i> ' | Support | Ravensdown supports the amendments sought by the submitter as they provide direction to the decision maker and plan user of the intent of the proposed NRP provisions. |
| Horticulture NZ | S307/034 | Policy P10 The submitter seeks an amendment to the policy to differentiate between provisions which apply to primary contact recreation and those which apply to secondary contact recreation. Alternatively have a separate policy for each. | Support | Ravensdown supports the amendments sought by the submitter as they provide direction to the decision maker and plan user of the intent of the proposed NRP provisions. |
| Royal Forest & Bird Protection Society | S353/063 | Policy P22 The submitter seeks to list adverse effects that are also required to be ' <i>avoided</i> '. | Oppose | While Ravensdown supports the policy avoiding significant adverse effects, it opposes the avoidance of adverse effects. Ravensdown considers adverse effects can be managed through remedying and mitigating them to acceptable levels, and seeks the policy to be amended to recognise this in Policy P22 in its own submission. |
| Horticulture NZ | S307/037 S307/039 | Policy P32 and P41 The submitter seeks an amendment to Policies P32 and P 41 clauses a) b) and c) by changing ' <i>and</i> ' to ' <i>or</i> ' | Support | Ravensdown supports the amendments sought by the submitter as they provide direction to the decision maker and plan user of the intent of the proposed NRP provisions. |
| Fish & Game | S308/062 | Policy P65 The submitter seeks policies to ensure the outcomes relating to water allocation, nitrogen leaching rates, nutrient budgets, livestock exclusion, intensified use in over-allocated catchments, nitrogen and phosphorous trading, and costs of reducing over-allocation are achieved; | Oppose | Ravensdown opposes the submission as it is not seeking specific relief but a raft of outcomes in relation to ideas that are not in accordance with the general direction of the proposed NRP. Some of the outcomes sought may fit better in specific catchment plans or the Whaitua process that is yet to come. Ravensdown considers the current proposed NRP provisions are appropriate and further submissions, as sought by the submitter, are not appropriate or necessary. |

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| Federated Farmers of NZ | S352/168 | Policy P65 The submitter seeks amendments to the policy that priorities and manages significant effects. | Support | Ravensdown supports the amendments requested as they are consistent with the amendments it sought in its own submission, and provide clear direction to the decision maker and plan user. |
| Federated Farmers of NZ | S352/171 | Policy P96 The submitter seeks amendments to the policy to better reflect the intended approach to managing land use activities by the proposed NRP. | Support | Ravensdown supports the amendments requested as they are consistent with the amendments it sought in its own submission, and provide clear direction to the decision maker and plan user. |
| Dairy NZ and Fonterra Co-operative Group Ltd | S316/077 | Policy P96 The submitter seeks amendments to the policy to better reflect the future way land use activities will be managed. | Support | Ravensdown supports the amendments requested as they are consistent with the amendments it sought in its own submission, and provide clear direction to the decision maker and plan user. |
| Fish & Game | S308/098 | Section 5 Rules The submitter seeks new rules to ensure the outcomes relating outcomes relating to sustainable nitrogen leaching rates, nutrient budgets, livestock exclusion, intensified use in currently over-allocated sub-catchments, nitrogen and phosphorus trading, allocation principles from Beef and Lamb are achieved; | Oppose | Ravensdown opposes the submission as it is not seeking specific relief but a raft of outcomes in relation to ideas that are not in accordance with the general direction of the proposed NRP. Some of the outcomes sought may fit better in specific catchment plans or the Whaitua process that is yet to come. Ravensdown considers the current proposed NRP provisions are appropriate and further submissions, as sought by the submitter, are not appropriate or necessary. |
| Beef & Lamb NZ | S311/011 | Rule R42 The submitter seeks Council to rewrite and align R42, R69 and R93 to provide for land uses that result in discharges to land where they may enter water, being a permitted activity, where the permitted land uses includes, but is not limited to, all forms of primary production. | Support | Ravensdown supports the amendments requested as they are consistent with the amendments it sought in its own submission, and provide clear direction to the decision maker and plan user. |

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| Fish & Game | S308/089 | <p>Rule R69</p> <p>The submitter seeks to amend the rule to include “<i>shall not enter water either directly or indirectly</i>”.</p> | Oppose | Ravensdown sought in its own submission that Rule R69 be deleted, but if Council retained the rule, that condition (a) be deleted. The submitter seeks an amendment to condition (a) which is opposed as it is onerous and would mean a resource user may not be able to determine whether the minor contaminant may enter the water indirectly, meaning permitted activity status is not certain. Having uncertain permitted activity rules is not considered best resource management planning practice. |
| Friends of the Paekakariki Streams | S112/094 | <p>Rule R82</p> <p>The submitter seeks the activity status to be changed from permitted to discretionary.</p> | Oppose | Ravensdown opposes this request as it considers permitted activity status for the application of fertiliser is appropriate in accordance with the conditions within the rule. Discretionary activity status would require consents sought by all farmers which would be costly and onerous, and does not represent sound resource management practice. |
| Regional Public Health | S136/018 | <p>Rule R82</p> <p>The submitter seeks the wording of proposed rule be amended by inclusion of a new clause “(d) <i>the discharge is not to an area with existing elevated groundwater nitrate levels.</i>”</p> | Oppose | Ravensdown opposes the requested amendment. Restricting applications of fertiliser that do not contain nitrogen will not address the issue the submitter is looking to trying to address. Elevated nitrate levels in groundwater can come from a number of sources but one of them is not from fertiliser application. Experienced practitioners applying fertiliser in general accordance with the Code of Practice for Nutrient Management means that the fertiliser requirements are matched to the requirements of the pasture or crop. The proposed amendment would restrict the application of fertiliser required for pasture or crop growth and such a restriction is inappropriate and unnecessary. |
| Horticulture NZ | S307/067 | <p>Rule R82</p> <p>The submitter seeks an amendment to Rule R82 clause a): “<i>The discharge does not cause adverse effects beyond the boundary of the property.</i>”</p> <p>Add new clause: “<i>The applications will be undertaken using good management practices to minimise the potential for wind drift having regard to the Code of Practice for Nutrient Management (Fertiliser Association).</i>”</p> | Support | Ravensdown supports the amendments sought by the submitter as they are consistent with its own submission; provides clarity regarding what the condition requires; and represents sound resource management practice. |

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| Beef & Lamb NZ | S311/015 | <p>Rule R82</p> <p>The submitter seeks an amendment to the rule that deletes Condition (a) and replaces it with: <i>“ground-based and aerial applications of fertiliser must follow the latest available Fertiliser Association of New Zealand Code of Practice; and”</i></p> | Support | Ravensdown supports the amendments sought by the submitter as they are consistent with its own submission; provides clarity regarding what the condition requires; and represents sound resource management practice. |
| Federated Farmers of NZ | S352/200 | <p>Rule R85</p> <p>The submitter seeks the deletion of Condition (c).</p> | Support | Ravensdown supports the amendments sought by the submitter as they are consistent with its own submission and represents sound resource management practice. |
| Horticulture NZ | S307/079 | <p>Method M12</p> <p>The submitter seeks a new method be added – <i>“Development of good management practices. The Council will work with industries and relevant stakeholders to develop good management practices that provide for robust and reasonable tools to manage activities regulated through the Plan.”</i></p> | Support | Ravensdown supports the amendments sought by the submitter as they are consistent with its own submission and represents sound resource management practice. |
| Federated Farmers of NZ | S352/244 | <p>Method M12</p> <p>The submitter seeks a number of amendments relating to developing catchment plans and providing assistance to willing landowners in clauses (c) and (d).</p> | Support | Ravensdown supports the amendments sought by the submitter as they promote catchment wide approaches and collaboration with land owners, and represent sound resource management practice. |
| Fish & Game | S308/138 | <p>Method M28</p> <p>The submitter seeks the method to be amended to include narrative and numerical parameters for good management practice. This should include those elements set out in appendix 10 to this submission, and must include specified management practices [identified in submission].</p> | Oppose | Ravensdown opposes the request to have numerical parameters for good management practices included in the method. It is inappropriate and does not represent sound resource management practice. |

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| Fertiliser Association of NZ | S302 | Entire Submission | Support | Ravensdown supports the entire submission of the fertiliser Association of NZ, and the relief sought. |
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FURTHER SUBMISSION ON PROPOSED NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION

(Closing date: 5pm Tuesday 29 March 2016)

To: Chief Executive Officer
Greater Wellington Regional Council
P O Box 11646
Wellington 6142

Further Submission on: Proposed Natural Resources Plan for the Wellington Region
(proposed NRP))

Name of Submitter: Maypole Environmental Limited.

Address of Submitter: C/- CHC Ltd
PO Box 51-282
Tawa
WELLINGTON 5249
Attention: Chris Hansen

Phone: 021 026 45 108
Email: Chris@rmaexpert.co.nz

1. A detailed further submission is attached.
2. Maypole Environmental Limited (Maypole) is an organisation who has an interest in the proposed NRP that is greater than the interest the general public has.
3. Maypole wishes to be heard in support of this further submission.
4. Maypole would be prepared to consider presenting its submission(s) in a joint case with others making a similar submission at any hearing.



.....
Chris Hansen

Authorised Agent of Maypole
Environmental Limited

29 March 2016
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Date

| Submitter ID/ Name | Point ID | Plan Provision/Relief Sought | Support/ Oppose | Reason |
|--|---------------------|---|--------------------------------|--|
| Wellington City Council | S286/006 | 4 Policies Remove the use of 'avoid' in the policies. | Support | Maypole supports the amendment sought as it is considered 'avoid' is an onerous test that can lead to unnecessary restrictions on activities. |
| Ian Jensen | S176/019 | Policy P9 New Rule sought: Provide reasonable access to parts of a site that may be denied by the presence of a Natural, Significant, Outstanding Wetland, or an Ecological Site, using the principals of Policy P4 and in particular (a, b & e). – 'Discretionary Activity'. | Support in part/Oppose in part | While Maypole supports the provisions of reasonable access to wetlands, it opposes the need for a discretionary activity consent to be gained, presumably to provide that access. Such a requirement is considered onerous and unnecessary. |
| Ravensdown Limited Kiwi Rail Holdings Ltd | S310/030 S140/09 | Policy P39 The submitters seek the policy be amended to apply to significant adverse effects, and to provide for remedying and mitigating of these effects (not just avoiding). | Support | Maypole supports the request of the submitters to amend the policy to apply to 'significant' adverse effects, and to provide for a range of management outcomes. It is considered the request is consistent with the intent of the RMA and represents sound resource management practice. |
| Rangitane o Wairarapa Inc. | S279/103 | Policy P43 The submitter seeks the policy to be amended to clarify that it relates only to activities necessary for the restoration of wetlands. | Oppose | Maypole considers there are activities appropriate to wetlands that are for more than restoration activities, including access for education purposes and amenity enjoyment. Maypole opposes the submission which is contrary to its own submission seeking direction regarding other activities that might be included in Wetland Restoration Management Plans while achieving the outcomes sought in the NRP for wetlands. |
| GBC Winstone | S66/009 | Policy P45 The submitter seeks the policy include recognition of established activities | Support | Maypole supports the amendments sought by the submitter that are consistent with its own submission that seeks for wider benefits to |

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| | | and any wider beneficial components of such activities. | | recognised, and are considered to represent sound resource management practice. |
| Powerco | S29/024 | Policy P45 The submitter seeks the policy to be amended to provide activities that are already established within the site, and minor effects associated with maintenance activities are allowed. | Support | Maypole supports the amendments sought by the submitter that are consistent with its own submission which seeks minor effects to be recognised, and are considered to represent sound resource management practice. |
| Kennott Family Trust Land Matters Ltd Vector Gas Ltd NZ Transport Agency Julian & Ruth Blackett USNZ Bell Camp Trust Carter Families Tim Mansell & Family | S297/049 S285/049 S145/039 S146/107 S299/049 S349/049 S294/049 S295/049 S351/049 | Policy P45 The submitters all seek the deletion of Clause d) requiring the written consent of the iwi authority. | Support | Maypole supports the amendments sought by the submitters that are consistent with its own submission which also seeks for this requirement to be deleted. Such a requirement is considered unnecessary and may be onerous to implement. |
| Trelissick Park Group | S88/011 | Policy P73 The submitter seeks an amendment to include a mandatory zero effects on stormwater runoff any new developments. | Oppose | Maypole opposes the amendment sought by the submitter as it does not provide for the management of effects, as provided for in the RMA. Such a requirement would be onerous and unnecessary where effects are minor or can be managed to acceptable levels. |
| NZ Transport Agency | S146/118 | Policy P73 The submitter seeks the policy to be amended so that adverse effects are minimised <i>'to the extent practicable'</i> . | Support | Maypole supports the request of the submitter to amend the policy to recognise a practicality element is appropriate and necessary. It is considered the request represents sound resource management practice. |
| Best Farm Limited, Hunters Hill Limited and Stebbing's Farmlands Limited | S149/005 | Policy P102 The submitter seeks a new condition for land within an Urban Development Area and land covered by a structure plan in a District Plan where the areas of highest ecological significance have been identified, and where these | Support in part | Maypole supports in part the request for a new condition that applies to land covered by a structure plan as this request is consistent with its own submission. Maypole considers the request represents sound resource management practice. |

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| | | significant areas are not affected by reclamation. | | |
| Hutt City Council | S84/019 | Policy P102 The submitter seeks reconsideration of the term 'avoid'. | Support | Maypole supports the reconsideration sought by the submitters as it is considered 'avoid' is an onerous test that can lead to unnecessary restrictions on activities. |
| Fish & Game | S308/069 | Policy P102 The submitter seeks the policy be deleted and reclamation or drainage of the beds of rivers and lakes should be prohibited. | Oppose | Maypole opposes the request by the submitter to delete the policy. This request is considered contrary to the purpose of the RMA and does not represent sound resource management practice. |
| Wellington Water Ltd | S135/101 | Policy P102 The submitter seeks for (c) to include growth areas identified in a District Plan or structure plan approved by the local authority. | Support | Maypole supports the amendments sought by the submitters that are consistent with its own submission, and supports the identification of growth areas in the District Plan and the use of the structure plan approach as sound resource management practice. |
| Dairy NZ and Fonterra Co-operative Group Ltd | S316/096 | Rule R48 The submitter seeks for Condition (a) to be amended to apply to a discharge that is not directly into a site. | Support | Maypole supports the amendments sought by the submitters that are consistent with its own submission which seeks clarity regarding when a discharge is to land rather than a wetland. |
| Trelissick Park Group | S88/005 | Rule R49 The submitter seeks an amendment to include a mandatory zero effects on stormwater runoff any new developments. | Oppose | Maypole opposes the amendments sought by the submitter as it does not provide for the management of effects, as provided for in the RMA. Such a requirement would be onerous and unnecessary where effects are minor or can be managed to acceptable levels. |
| Meridian Energy Limited Carterton District Council | S82/028 S301/060 | Rule R67 The submitters seek the rule to be discretionary activity rather than non-complying. | Support | Maypole supports the request for the activity status to be changed as it is considered more appropriate for the activity being controlled, and represents sound resource management practice. |
| NZ Transport Agency | S146/170 | Rule R110 The submitter seeks the rule to clarify it does not apply to stormwater. | Support in part | Maypole supports the amendments sought by the submitters that are consistent with its own submission, for the reasons included in its own submission. |

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| Nga Hapu o Otaki | S309/040 | <p>Rule R125</p> <p>The submitter seeks for Schedule B waterbodies to be included in the rule.</p> | Oppose | <p>Maypole opposes the amendment sought by the submitter as it introduces a range of waterbodies into the rule that has a specific intent of applying to Schedule C sites. This has implications for a large number of land owners that would require to them to gain consent for activities under the rule. It is considered the request is unnecessary and inappropriate, and the current provisions of the proposed NRP appropriately address matters relating to Schedule B sites without the amendment sought.</p> |
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Submitter ID:

File No:



greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

Further Submission

on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Andrea Kapoutsos

ORGANISATION (* the organisation that this submission is made on behalf of)

Ministry for Primary Industries

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

Pastoral House, 25 The Terrace, PO Box 2526, Wellington 6140

PHONE

0800 00 83 33

FAX

NA

EMAIL

rma@mpi.govt.nz

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

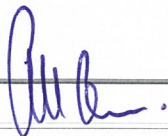
The Ministry for Primary Industries (MPI) provides overall leadership for New Zealand's biosecurity system, and together with regional councils, has a designated leadership role for pest management related activities. Pest and diseases, including invasive marine species, can have significant adverse impacts on our economic, environmental, human health and social values.

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:



Date:

29 March 2016

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
 I do wish to be heard in support of my further submission; and, if so,
 I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|--|---|--|--|--|
| Name of person/group making original submission and postal address. | The original submission number can be found on the submitter address list. | Whether you support or oppose the submission. | Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Why you support or oppose each submission point. | The part or whole of each submission point you wish to be allowed or disallowed. |
| <i>e.g. Joanne Bloggs 12 Pine Tree Avenue Redwood</i> | <i>e.g. submitter S102</i> | <i>e.g. Oppose</i> | <i>e.g. Oppose all of submission point S102/41</i> | <i>e.g. The submission point does not recognise...</i> | <i>e.g. Disallow the parts of S102/41 relating to...</i> |
| New Zealand Diving and Salvage Limited | Submitter S147 | Oppose | Oppose all of submission point S147/002 | The submission point does not recognise the need for recapture of biofouling material from vessels with macrofouling biofouling of domestic origin . | Take into account the guidance in the Australia and New Zealand Anti-fouling and In-water cleaning Guidelines with regards to biofouling of domestic origin. |
| New Zealand Diving and Salvage Limited | Submitter S147 | Oppose | Oppose all of submission point S147/005 | As summarised, the submission point suggests collected material will be allowed to be discharged into the coastal marine environment which negates the purpose of condition (d). The submission point recognises the need for less stringent measures with regards to microfouling as per the guidance in the Australia and New Zealand Anti-fouling and In-water cleaning Guidelines | Disallow submission point S147/005 as it does not take into account guidance in the Australia and New Zealand Anti-fouling and In-water cleaning Guidelines, or seek further clarity from the submitter. |
| New Zealand Diving and Salvage Limited | Submitter S147 | Support | Support all of submission point S147/001 | The submission point recognises the need for less stringent measures with regards to microfouling as per the guidance in the Australia and New Zealand Anti-fouling and In-water cleaning Guidelines | Support the submission point as it calls for alignment with the Australia and New Zealand Anti-fouling and In-water cleaning Guidelines |
| New Zealand Diving and Salvage Limited | Submitter S147 | Support | Support all of submission point S147/006 | The submission recognises the need for recapture of biofouling material from vessels with macro fouling of domestic origin. | Support the submission point as it calls for alignment with the Australia and New Zealand Anti-fouling and In-water cleaning Guidelines |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|---|
| Kiwi Rail Holdings Ltd | Submitter 140 | Oppose | Oppose the suggested amendment in submission point S140/055 | <p>The submission doesn't account for the need for recapture of biofouling material from vessels with macro fouling of domestic origin.</p> <p>Contrary to the statement that KiwiRail could not continue to clean their vessels in water as it currently does – the proposed rule encourages more regular cleaning of microfouling (condition c). It should also be recognised that the Australia and New Zealand Anti-fouling and In-water cleaning Guidelines suggest that 'Macro fouling of domestic origin may be removed without the need for full containment...following risk assessment by the relevant authority.'</p> | <p>In addition to the application of the rule to international vessels, also include the application of the proposed rule to vessels with biofouling of domestic origin (as per the Australia and New Zealand Anti-fouling and In-water cleaning Guidelines)</p> |
| CentrePort Limited | Submitter S121 | Oppose | Oppose the suggested amendment in submission point S121/102 | <p>The submission doesn't account for the need for recapture of biofouling material from vessels with macro fouling of domestic origin.</p> <p>Contrary to the statement that domestic operators could not continue to clean their vessels in water as they currently do – the proposed rule encourages more regular cleaning of microfouling (condition c). It should also be recognised that the Australia and New Zealand Anti-fouling and In-water cleaning Guidelines suggest that 'Macro fouling of domestic origin may be removed without the need for full containment...following risk assessment by the relevant authority.'</p> | <p>In addition to the application of the rule to international vessels, also include the application of the proposed rule to vessels with biofouling of domestic origin (as per the Australia and New Zealand Anti-fouling and In-water cleaning Guidelines)</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---------|---------------|
|---|----------------------------|----------|---|---------|---------------|

If you require more space for additional comments, please insert new rows as needed

FOR OFFICE USE ONLY

Submitter ID:

File No:



greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

Further Submission on Proposed Natural Resources Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

FULL NAME

Andrew Beatson

ORGANISATION (* the organisation that this submission is made on behalf of)

CentrePort Properties Limited

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

c/o Bell Gully
PO Box 1291
Wellington
6140

PHONE

04 915 6770

FAX

EMAIL

andrew.beatson@bellgully.com

Only certain people may make further submissions

Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest; or
 I am a person who has an interest in the PNRP that is greater than the interest the general public has.

Specify below the grounds for saying that you are within the category you have ticked.

CentrePort Properties Limited has an interest as a landowner and occupier in respect of existing and future infrastructure which is potentially affected (directly or indirectly) by the relevant submissions; and
In respect of many submissions, CentrePort Properties Limited made an original submission on matters raised or affected by those submissions.

Service of your further submission

Please note that you must **serve a copy of this further submission on the original submitter no later than five working days after this further submission has been provided to Wellington Regional Council.**

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Signature:

Date:

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Please note

All information contained in a further submission under the Resource Management Act 1991 becomes public information. All further submissions will be put on our website and will include all personal details included in the further submission.

B. APPEARANCE AT HEARING

Please select from the following:

- I do not wish to be heard in support of my further submission; or
- I do wish to be heard in support of my further submission; and, if so,
- I would be prepared to consider presenting this further submission in a joint case with others making a similar further submission at any hearing.

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on Name of person/ group making original submission and postal address. | Original submission number The original submission number can be found on the submitter address list. | Position Whether you support or oppose the submission. | Part(s) of the submission you support or oppose Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Reasons Why you support or oppose each submission point. | Relief sought The part or whole of each submission point you wish to be allowed or disallowed. |
|--|---|--|--|--|--|
| <i>e.g.</i> Joanne Bloggs 12 Pine Tree Avenue Redwood | <i>e.g.</i> submitter S102 | <i>e.g.</i> Oppose | <i>e.g.</i> Oppose all of submission point S102/41 | <i>e.g.</i> The submission point does not recognise... | <i>e.g.</i> Disallow the parts of S102/41 relating to... |
| 2. Interpretation | | | | | |
| Wellington Civic Trust PO Box 10183 Wellington, 6143 New Zealand | S62 | Support | Support all of submission point S62/001 | CentrePort Properties Limited supports the retention of the extension of the Lambton Harbour Areas as provided for in the definition and map in general terms subject to the careful management of development in the area. | Allow in whole submission point S62/001 |
| South Wairarapa District Council PO Box 6 Martinborough, 5741 New Zealand | S366 | Support | Support all of submission point S366/017 | The submission seeks to amend the definition of Maori customary use to provide greater certainty to its meaning. CentrePort Properties Limited considers that the term Maori customary use is very broadly defined. As CentrePort Properties Limited's wharves are located in the Coastal Marine Area, greater clarity is needed as to the activities that constitute Maori customary use. | Allow in whole submission point S366/017 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|---|
| Masterton District Council C/ Geange Consulting PO Box 213 Carterton, 5743 New Zealand | S367 | Support | Support all of submission point S367/017 | The submission seeks to amend the definition of Maori customary use to provide greater certainty to its meaning. CentrePort Properties Limited considers that "the term Maori customary use is very broadly defined. As CentrePort Properties Limited's wharves are located in the Coastal Marine Area, greater clarity is needed as to the activities that constitute Maori customary use. | Allow in whole submission point S367/017 |
| CentrePort Limited PO Box 794 Hinemoa Street Wellington, 6140 | S121 | Support | Support all of submission point S121/013 | The submission seeks the addition of the words "other structures" in the definition of port related activities. CentrePort Properties Limited is not opposed to the addition of those words, but seeks the deletion of the last sentence of the proposed definition as it is unnecessary. CentrePort Properties Limited notes that the Summary of Decisions document does not accurately identify the relief sought in its original submission. | Allow in whole submission point S121/013, but also amend to address the relief sought in CentrePort Properties Limited's original submission |
| CentrePort Limited PO Box 794 Hinemoa Street Wellington, 6140 | S121 | Support | Support all of submission point S121/008 | CentrePort Properties Limited supports the submission seeking clarity as to why all of the CMA is defined as a High Hazard Area and its implications for effects based decision making. This is because this definition means that Policy 27 is inconsistent with policies that allow use and development in the Lambton Harbour Area, which is also a High Hazard Area by virtue of being in the coastal marine area. | Allow in whole submission point S121/008 |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City | S85 | Support | Support all of submission point S85/004 | The submission seeks to amend the definition of high hazard areas. CentrePort Properties Limited | Allow in whole submission point S85/004 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|---|
| Council and Upper Hutt City Council PO Box 2083 Wellington, 6140 New Zealand | | | | agrees that the definition should be based on an appropriate assessment of actual hazard, rather than capturing all coastal areas. | |
| Kiwi Rail Holdings Limited PO Box 593 Wellington, 6140 New Zealand | S140 | Support | Support all of submission point S140/010 | The submission seeks the addition of the words “other structures” in the definition of port related activities. CentrePort Properties Limited is not opposed to the addition of those words, but seeks the deletion of the last sentence of the proposed definition as it is unnecessary. CentrePort Properties Limited notes that the Summary of Decisions document does not accurately identify the relief sought in its original submission. | Allow in whole submission point S140/010, but also amend to address the relief sought in CentrePort Properties Limited’s original submission |
| CentrePort Limited PO Box 794 Hinemoa Street Wellington, 6140 | S121 | Support | Support all of submission point S121/014 | The submission seeks to retain the definition of reclamation. CentrePort Properties Limited supports the definition of reclamation so it is clear to all users of the plan that it means the creation of dry land. | Allow in whole submission point S121/014 |
| NZ Transport Agency PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146 | Support | Support all of submission point S146/028 | The submission seeks to retain the definition of reclamation. CentrePort Properties Limited supports the definition of reclamation so it is clear to all users of the plan that it means the creation of dry land. | Allow in whole submission point S146/028 |
| Transpower New Zealand Limited PO Box 11 340, Level 4, Huddart Parker Building 1 Post Office Square, Wellington 6142 New Zealand | S165 | Support | Support all of submission point S165/082 | The submission seeks to retain the definition of reclamation. CentrePort Properties Limited supports the definition of reclamation so it is clear to all users of the plan that it means the creation of dry land. | Allow in whole submission point S165/082 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|---|
| NZ Transport Agency PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146 | Support | Support all of submission point S146/031 | CentrePort Properties Limited supports the amendment sought to the definition of reverse sensitivity because it is appropriate to recognise the vulnerability of existing lawfully-established activities (including their operation, maintenance, upgrade and development) to other activities in the vicinity which are sensitive to adverse environmental effects. | Allow in whole submission point S146/031 |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council PO Box 2083 Wellington, 6140 New Zealand | S85 | Support | Support in part submission point S85/085 | CentrePort Properties Limited is not in principle opposed to a new definition of "seawall". CentrePort Properties Limited's support is conditional on the wording of the definition. | Allow in part submission point S85/085 relating to a new definition of "seawall", to the extent that the proposed definition is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| 3. Objectives | | | | | |
| Fertiliser Association NZ Ground Floor, 4 Hazeldean Road PO Box 110 Christchurch, 8140 New Zealand | S302 | Support | Support submission point S302/014 | CentrePort Properties Limited supports new objectives relating to enabling and providing for the use of land as this is an important component of sustainable management. | Allow in whole submission point S302/014 |
| Bryce Derek Wilkinson PO Box 10972 The Terrace Wellington, 6143 New Zealand | S109 | Oppose | Oppose all of submission point S109/001 | The submission seeks that Objectives 5, 9-11, 13-31, 34-51, and 58, all be amended to provide that the objective is only to be pursued to the degree that the benefits to affected members of the community exceed the costs. CentrePort Properties Limited opposes this submission point as it fails to acknowledge the wider local, regional and national benefits of the objectives. | Disallow in whole submission point S109/001 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|--|
| Mt Victoria Residents Association 29 Moir Street Mt Victoria Wellington, 6011 New Zealand | S162 | Oppose | Oppose all of submission point S162/014 | CentrePort Properties Limited opposes the submission point which seeks provisions for land-based historic heritage areas and sites given this is the function of the Wellington City Council. | Disallow in whole submission point S162/014 |
| Masterton District Council C/ Geange Consulting PO Box 213 Carterton, 5743 New Zealand | S367 | Support | Support all of submission point S367/054 | The submission seeks that Objectives O31 to O38 (inclusive) be amended to clearly identify that the protective requirements of those provisions only relate to the identified features and matters determined to be of value within that relevant Schedule, and changes to the maps. CentrePort Properties Limited supports this submission as it is important users of the plan have certainty as to the features to be protected from inappropriate subdivision, use and development. | Allow in whole submission point S367/054 |
| South Wairarapa District Council PO Box 6 Martinborough, 5741 New Zealand | S366 | Support | Support all of submission point S366/054 | The submission seeks that Objectives O31 to O38 (inclusive) be amended to clearly identify that the protective requirements of those provisions only relate to the identified features and matters determined to be of value within that relevant Schedule, and changes to the maps. CentrePort Properties Limited supports this submission as it is important users of the plan have certainty as to the features to be protected from inappropriate subdivision, use and development. | Allow in whole submission point S366/054 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|---|
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose all of submission point S279/045 | CentrePort Properties Limited does not agree the objective should refer to protection of sites without any qualifier (if that is the intent of the submission) because that would be inconsistent with section 6 of the RMA. | Disallow in whole submission point S279/045 |
| Coastal Ratepayers United Incorporated 199 Manly Street Paraparaumu, 5032 New Zealand | S93 | Support | Support in part submission point S93/005 | CentrePort Properties Limited considers that there would be benefit in developing an overarching objective and corresponding policy in respect of use and development in the coastal environment to prevent the Plan from inadvertently preventing activities that might otherwise be contemplated by the NZCPS. | Allow in part submission point S93/005 relating to new objective and policy for use and development, to the extent that the proposed objective and policy are not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Mahaki Holdings Ltd 20 Addington Road RD 1 Otaki, 5581 New Zealand | S370 | Oppose | Oppose in part submission point S370/080 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words "where possible" are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words "where appropriate" are inserted in the Objective, as per its original submission on the Plan. | Disallow in part submission point S370/080, relating to the inclusion of the words "where possible" |
| Carter Families 20 Addington Road RD 1 Otaki, 5581 New Zealand | S295 | Oppose | Oppose in part submission point S295/080 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should | Disallow in part submission point S295/080, relating to the inclusion of the words "where possible" |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|--|
| | | | | be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. | |
| Julian and Ruth Blackett, 20 Addington Road RD 1 Otaki, 5581 New Zealand | S299 | Oppose | Oppose in part submission point S299/080 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. | Disallow in part submission point S299/080, relating to the inclusion of the words “where possible” |
| Kennott Family Trust 20 Addington Road RD 1 Otaki, 5581 New Zealand | S297 | Oppose | Oppose in part submission point S297/080 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate | Disallow in part submission point S297/080, relating to the inclusion of the words “where possible” |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|--|
| | | | | qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. | |
| Bell Camp Trust 20 Addington Road RD 1 Otaki, 5581 New Zealand | S294 | Oppose | Oppose in part submission point S294/080 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. | Disallow in part submission point S294/080, relating to the inclusion of the words “where possible” |
| Land Matters Ltd 20 Addington Road RD 1 Otaki, 5581 New Zealand | S285 | Oppose | Oppose in part submission point S285/080 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine | Disallow in part submission point S285/080, relating to the inclusion of the words “where possible” |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|--|
| | | | | area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. | |
| Max Lutz 20 Addington Road RD 1 Otaki, 5581 New Zealand | S348 | Oppose | Oppose in part submission point S348/078 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. | Disallow in part submission point S348/078, relating to the inclusion of the words “where possible” |
| Tim Mansell and Family 20 Addington Road RD1 Otaki, 5581 New Zealand | S351 | Oppose | Oppose in part submission point S351/080 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the | Disallow in part submission point S351/080, relating to the inclusion of the words “where possible” |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|---|
| | | | | Objective, as per its original submission on the Plan. | |
| <p>Waikanae Christian Holiday Park 20 Addington Road RD 1 Otaki, 5581 New Zealand</p> | S346 | Oppose | Oppose in part submission point S346/080 | <p>CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan.</p> | <p>Disallow in part submission point S346/080, relating to the inclusion of the words “where possible”</p> |
| <p>USNZ 20 Addington Road RD 1 Otaki, 5581 New Zealand</p> | S349 | Oppose | Oppose in part submission point S349/080 | <p>CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan.</p> | <p>Disallow in part submission point S349/080, relating to the inclusion of the words “where possible”</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| Kennott Family Trust 20 Addington Road RD 1 Otaki, 5581 New Zealand | S297 | Oppose | Oppose in part submission point S297/036 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. CentrePort Properties Limited is not in principle opposed to the words “where identified”, but its support is conditional on where the identified areas are. | Disallow in part submission point S297/036, relating to the inclusion of the words “where possible” and the inclusion of “where identified” depending on where the identified areas are |
| Julian and Ruth Blackett, 20 Addington Road RD 1 Otaki, 5581 New Zealand | S299 | Oppose | Oppose in part submission point S299/036 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original | Disallow in part submission point S299/036, relating to the inclusion of the words “where possible” and the inclusion of “where identified” depending on where the identified areas are |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|---------------|---|---|---|
| | | | | <p>submission on the Plan. CentrePort Properties Limited is not in principle opposed to the words “where identified”, but its support is conditional on where the identified areas are.</p> | |
| <p>Carter Families 20 Addington Road RD 1 Otaki, 5581 New Zealand</p> | <p>S295</p> | <p>Oppose</p> | <p>Oppose in part submission point S295/036</p> | <p>CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. CentrePort Properties Limited is not in principle opposed to the words “where identified”, but its support is conditional on where the identified areas are.</p> | <p>Disallow in part submission point S295/036, relating to the inclusion of the words “where possible” and the inclusion of “where identified” depending on where the identified areas are</p> |
| <p>Land Matters Ltd 20 Addington Road RD 1 Otaki, 5581 New Zealand</p> | <p>S285</p> | <p>Oppose</p> | <p>Oppose in part submission point S285/036</p> | <p>CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in</p> | <p>Disallow in part submission point S285/036, relating to the inclusion of the words “where possible” and the inclusion of “where identified” depending on where the identified areas are</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|---------------|---|---|---|
| | | | | <p>some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. CentrePort Properties Limited is not in principle opposed to the words “where identified”, but its support is conditional on where the identified areas are.</p> | |
| <p>Bell Camp Trust 20 Addington Road RD 1 Otaki, 5581 New Zealand</p> | <p>S294</p> | <p>Oppose</p> | <p>Oppose in part submission point S294/036</p> | <p>CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. CentrePort Properties Limited is not in principle opposed to the words “where identified”, but its support is conditional on where the identified areas are.</p> | <p>Disallow in part submission point S294/036, relating to the inclusion of the words “where possible” and the inclusion of “where identified” depending on where the identified areas are</p> |
| <p>Mahaki Holdings Ltd 20 Addington Road RD 1 Otaki, 5581 New Zealand</p> | <p>S370</p> | <p>Oppose</p> | <p>Oppose in part submission point S370/036</p> | <p>CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort</p> | <p>Disallow in part submission point S370/036, relating to the inclusion of the words “where possible” and the inclusion of “where identified” depending on where the identified areas are</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|---------------|---|--|---|
| | | | | <p>Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. CentrePort Properties Limited is not in principle opposed to the words “where identified”, but its support is conditional on where the identified areas are.</p> | |
| <p>Max Lutz 20 Addington Road RD 1 Otaki, 5581 New Zealand</p> | <p>S348</p> | <p>Oppose</p> | <p>Oppose in part submission point S348/078</p> | <p>CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. CentrePort Properties Limited is not in principle opposed to the words “where identified”, but its support is conditional on where the identified</p> | <p>Disallow in part submission point S348/078, relating to the inclusion of the words “where possible” and the inclusion of “where identified” depending on where the identified areas are</p> |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|--|
| | | | | areas are. | |
| Tim Mansell and Family 20 Addington Road RD1 Otaki, 5581 New Zealand | S351 | Oppose | Oppose in part submission point S351/036 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. CentrePort Properties Limited is not in principle opposed to the words “where identified”, but its support is conditional on where the identified areas are. | Disallow in part submission point S351/036, relating to the inclusion of the words “where possible” and the inclusion of “where identified” depending on where the identified areas are |
| Waikanae Christian Holiday Park 20 Addington Road RD 1 Otaki, 5581 New Zealand | S346 | Oppose | Oppose in part submission point S346/036 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. | Disallow in part submission point S346/036, relating to the inclusion of the words “where possible” and the inclusion of “where identified” depending on where the identified areas are |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|--|--|--|
| | | | | CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. CentrePort Properties Limited is not in principle opposed to the words “where identified”, but its support is conditional on where the identified areas are. | |
| USNZ 20 Addington Road RD 1 Otaki, 5581 New Zealand | S349 | Oppose | Oppose in part submission point S349/036 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified. However, CentrePort Properties Limited does not consider that the words “where possible” are the appropriate qualifier, as maintenance and enhancement of recreational values may be technically possible in some areas of the coastal marine area but may not be appropriate. CentrePort Properties Limited seeks that the words “where appropriate” are inserted in the Objective, as per its original submission on the Plan. CentrePort Properties Limited is not in principle opposed to the words “where identified”, but its support is conditional on where the identified areas are. | Disallow in part submission point S349/036, relating to the inclusion of the words “where possible” and the inclusion of “where identified” depending on where the identified areas are |
| Federated Farmers of NZ PO Box 715 Wellington, 6140 New Zealand | S352 | Support | Support in part all of submission point S352/060 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified, as it will not be appropriate everywhere in the coastal marine area. CentrePort | Allow in part submission point S352/060, relating to limiting Objective 09 to named priority areas depending on where the named areas are |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|---|
| | | | | Properties Limited is not in principle opposed to the relief sought by Federated Farmers of NZ, but its support is conditional on the (named) priority areas first being identified and where the identified areas are. | |
| Wellington International Airport Ltd PO Box 489 Dunedin, 9054 New Zealand | S282 | Support | Support all of submission point S282/006 | CentrePort Properties Limited agrees that the maintenance and enhancement of recreational values in the coastal marine area should be qualified, as it will not be appropriate everywhere in the coastal marine area. CentrePort Properties Limited supports Wellington International Airport Ltd's submission as it is consistent with CentrePort Properties Limited's original submission. | Allow in whole submission point S282/006 |
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | Support in part submission point S286/003 | CentrePort Properties Limited is not in principle opposed to the inclusion of provisions that manage and control the use of buildings and structures and changes of use in the CMA. CentrePort Properties Limited's support is dependent upon the particular provisions proposed. | Allow in part submission point S286/003 relating to the coastal management objectives, to the extent that the proposed provisions are not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Masterton District Council C/ Geange Consulting PO Box 213 Carterton, 5743 New Zealand | S367 | Oppose | Oppose all of submission point S367/063 | The submission seeks that the objective be amended so that use and development in the coastal marine area has a functional or <u>historical</u> need or operational requirement to be located there. CentrePort Properties Limited opposes this amendment as the addition of historical need is unnecessary, and is likely to be inconsistent with Objective O57 which provides that use and | Disallow in whole submission point S367/063 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|--|
| | | | | development is appropriate in the Lambton Harbour Area when it is compatible with its surroundings and the Central Area of Wellington City. | |
| South Wairarapa District Council PO Box 6 Martinborough, 5741 New Zealand | S366 | Oppose | Oppose all of submission point S366/063 | The submission seeks that objective be amended so that use and development in the coastal marine area has a functional or <u>historical</u> need or operational requirement to be located there. CentrePort Properties Limited opposes this amendment as the addition of historical need is unnecessary, and is likely to be inconsistent with Objective O57 which provides that use and development is appropriate in the Lambton Harbour Area when it is compatible with its surroundings and the Central Area of Wellington City. | Disallow in whole submission point S366/063 |
| Coastal Ratepayers United Incorporated 199 Manly Street Paraparaumu, 5032 New Zealand | S93 | Support | Support in part submission point S93/038 | CentrePort Properties Limited agrees the objective should be revised to recognise “operational requirement” and “functional need” are not required in all situations for use and development within the CMA, as recognised by the NZCPS. | Allow in part submission point S93/038 relating to Objective 053, to the extent that that the revised objective is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited’s submissions on the Plan. |
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose all of submission point S279/064 | The submission seeks that the objective be amended so that activities shall not be located in the coastal marine area except where they have a functional need to be located there. CentrePort Properties Limited opposes this amendment as this is inconsistent with the NZCPS and Objective O57 which provides that use and | Disallow in whole submission point S279/064 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|--|
| | | | | development is appropriate in the Lambton Harbour Area when it is compatible with its surroundings and the Central Area of Wellington City. | |
| Joan Allin and Rob Crozier 47 Rodney Ave RD1 Otaki, 5581 New Zealand | S175 | Support | Support in part submission point S175/026 | CentrePort Properties Limited agrees the objective should be revised to recognise “operational requirement” and “functional need” are not required in all situations for use and development within the CMA, as recognised by the NZCPS. | Allow in part submission point S175/026 relating to Objective 053, to the extent that the revised objective is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited’s submissions on the Plan. |
| Royal Forest and Bird Protection Society PO Box 631 Wellington, 6140 New Zealand | S353 | Oppose | Oppose all of submission point S353/045 | CentrePort Properties Limited considers that the relief sought in the submission point is too restrictive, and is inconsistent with Objective O57 which provides that use and development is appropriate in the Lambton Harbour Area when it is compatible with its surroundings and the Central Area of Wellington City. | Disallow in whole submission point S353/045 |
| CentrePort Limited PO Box 794 Hinemoa Street Wellington, 6140 | S121 | Support | Support all of submission point S121/037 | CentrePort Properties Limited supports the amendment of this objective because it is appropriate to provide that new development is of a scale, density and design that is compatible with its function and location in the coastal environment. | Allow in whole submission point S121/037 |
| Kiwi Rail Holdings Limited PO Box 593 Wellington, 6140 New Zealand | S140 | Support | Support all of submission point S140/027 | CentrePort Properties Limited supports the amendment of this objective because it is appropriate to provide that new development is of a scale, density and design that is compatible with its function and location in the coastal environment. | Allow in whole submission point S140/027 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|--|
| Coastal Ratepayers United Incorporated 199 Manly Street Paraparaumu, 5032 New Zealand | S93 | Support | Support all of submission point S93/039 | CentrePort Properties Limited supports the amendment of this objective because it is appropriate to provide that new development is compatible with its purpose. | Allow in whole submission point S93/039 |
| Joan Allin and Rob Crozier 47 Rodney Ave RD1 Otaki, 5581 New Zealand | S175 | Support | Support all of submission point S175/027 | CentrePort Properties Limited supports the amendment of this objective because it is appropriate to provide that new development is compatible with its purpose. | Allow in whole submission point S175/027 |
| Wellington Civic Trust PO Box 10183 Wellington, 6143 New Zealand | S62 | Oppose | Oppose all of submission point S62/009 | CentrePort Properties Limited considers it unnecessary to refer to Objectives 55 and 56 in Objective 57 as these objectives will already apply and should not be afforded greater weight. | Disallow in whole submission point S62/009 |
| Site 10 Redevelopment Limited Partnership c/- Willis Bond & CO Limited Level 2, 5 Cable Street Wellington, 6142 New Zealand | S160 | Oppose | Oppose all of submission point S160/002 | Site 10 Redevelopment Limited Partnership seeks express recognition in this objective that new development in the CMA be compatible with the surroundings, in particular the Wellington waterfront. CentrePort Properties Limited does not consider it is necessary or appropriate to expressly refer to the Wellington waterfront. | Disallow in whole submission point S160/002 |
| 4. Policies | | | | | |
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose all of submission point S279/228 | CentrePort Properties Limited opposes unspecified changes to the policies in section 4 as it is not clear what relief is being sought. | Disallow in whole submission point S279/228 |
| Coastal Ratepayers United Incorporated 199 Manly Street Paraparaumu, 5032 New Zealand | S93 | Support | Support in part submission point S93/042 | CentrePort Properties Limited supports in principle the inclusion of a policy that enables appropriate use and development in the coastal | Allow in part submission point S93/042 relating to new policy for use and development, to the extent that the proposed objective and policy are not |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|---|
| Zealand | | | | environment to ensure the Plan does not inadvertently prevent activities that might otherwise be contemplated by the NZCPS. | inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan |
| NZ Transport Agency PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146 | Oppose | Oppose all of submission point S146/075 | Section 5 of the RMA requires adverse effects of development to be avoided, remedied or mitigated; however, it does not prescribe a hierarchy. The words are to be given equal importance, and whether emphasis is given to avoiding, remedying or mitigation will depend on the facts of a particular case. On this basis, CentrePort Properties Limited opposes the creation of a mitigation hierarchy in the Plan. | Disallow in whole submission point S146/075 |
| Heritage NZ PO Box 2629 Wellington, 6140 New Zealand | S94 | Oppose | Oppose all of submission point S94/004 | The submission seeks to retain the policies relating to historic and cultural heritage. CentrePort Properties Limited has sought amendment of these policies to provide for the mixed use redevelopment of the Waterloo Quay and Interisland wharves, the Coastal Marine Area around the wharves and adjacent land areas. CentrePort Properties Limited opposes this submission point on the basis that it is inconsistent with the relief sought in its original submission on the Plan. | Disallow in whole submission point S94/004 |
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | Support all of submission point S286/006 | The submission seeks to remove the use of 'avoid' in the policies. CentrePort Properties Limited supports this submission, given that avoiding adverse effects may not be appropriate in certain circumstances, and in light of the implications of the Supreme Court's | Allow in whole submission point S286/006 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|---|
| | | | | <i>King Salmon</i> decision. | |
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose all of submission point S279/229 | The submission seeks to amend all policies that refer to effects being minimised so that management outcomes are clear. CentrePort Properties Limited opposes the submission as it is not clear what management outcomes are being sought. | Disallow in whole submission point S279/229 |
| Bryce Derek Wilkinson PO Box 10972 The Terrace Wellington, 6143 New Zealand | S109 | Oppose | Oppose all of submission point S109/002 | The submission seeks to amend or delete all policies that are connected to objectives 9-11, 13-31, 34-51, 58 and fail to explicitly require that benefits to affected members of the community exceed the costs. CentrePort Properties Limited opposes this submission point as it fails to acknowledge the wider local, regional and national benefits of the objectives. | Disallow in whole submission point S109/002 |
| Java Trust Limited PO Box 134 Greytown 5742 | S120 | Support | Support in part submission point S120/009 | CentrePort Properties Limited supports the deletion of this policy in the event that the relief sought by CentrePort Properties Limited is not granted. | Allow in part submission point S120/009 relating to the deletion of Policy 4 and related provisions, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted |
| Royal Forest and Bird Protection Society PO Box 631 Wellington, 6140 New Zealand | S353 | Support | Support in part submission point S353/053 | CentrePort Properties Limited supports the deletion of this policy in the event that the relief sought by CentrePort Properties Limited is not granted. | Allow in part submission point S353/053 relating to the deletion of Policy 4 and using terminology consistent with the RMA, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted. |
| Fertiliser Association NZ Ground Floor, 4 Hazeldean Road PO Box 110 Christchurch, 8140 New Zealand | S302 | Support | Support in part submission point S302/029 | CentrePort Properties Limited supports the deletion of this policy in the event that the relief sought by CentrePort Properties Limited is not granted. | Allow in part submission point S302/029 relating to the deletion of the policy, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|---|
| Fish and Game PO Box 1325 Palmerston North, 4440 New Zealand | S308 | Support | Support in part submission point S308/043 | CentrePort Properties Limited supports the deletion of this policy in the event that the relief sought by CentrePort Properties Limited is not granted. | Allow in part submission point S308/043 relating to the deletion of the policy, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted. |
| Holcim NZ Limited PO Box 6040 Upper Riccarton Christchurch, 8442 New Zealand | S276 | Support | Support in part submission point S276/009 | CentrePort Properties Limited supports the deletion of this policy in the event that the relief sought by CentrePort Properties Limited is not granted. | Allow in part submission point S276/009 relating to the deletion of the policy, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted. |
| Joan Allin and Rob Crozier 47 Rodney Ave RD1 Otaki, 5581 New Zealand | S175 | Support | Support in part submission point S175/030 | CentrePort Properties Limited supports the deletion of this policy in the event that the relief sought by CentrePort Properties Limited is not granted. | Allow in part submission point S175/030 relating to the deletion of the policy, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted. |
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Support | Support in part submission point A279/072 | CentrePort Properties Limited supports the deletion of this policy in the event that the relief sought by CentrePort Properties Limited is not granted. | Allow in part submission point A279/072 relating to the deletion of the policy, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted. |
| Wellington International Airport Ltd PO Box 489 Dunedin, 9054 New Zealand | S282 | Support | Support in part submission point S282/028 | CentrePort Properties Limited supports the deletion of this policy in the event that the relief sought by CentrePort Properties Limited is not granted. | Allow in part submission point S282/028 relating to the deletion of the policy, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted. |
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | Support all of submission point S286/016 | CentrePort Properties Limited supports the deletion of matter (b): locating the activity away from areas identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule E (historic heritage), Schedule F (indigenous biodiversity), as this provision is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. | Allow in whole submission point S286/016 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|--|
| Fish and Game PO Box 1325 Palmerston North, 4440 New Zealand | S308 | Oppose | Oppose all of submission point S308/043 | CentrePort Properties Limited opposes the replacement policy suggested by Fish and Game as it is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. | Disallow in whole submission point S308/043 |
| Kennott Family Trust 20 Addington Road RD 1 Otaki, 5581 New Zealand | S297 | Support | Support in part submission point S297/007 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S297/007 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Julian and Ruth Blackett, 20 Addington Road RD 1 Otaki, 5581 New Zealand | S299 | Support | Support in part submission point S299/007 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S299/007 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Land Matters Ltd 20 Addington Road RD 1 Otaki, 5581 New Zealand | S285 | Support | Support in part submission point S285/103 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited | Allow in part submission point S285/103 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|--|
| | | | | supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | |
| Carter Families 20 Addington Road RD 1 Otaki, 5581 New Zealand | S295 | Support | Support in part submission point S295/007 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S295/007 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Max Lutz 20 Addington Road RD 1 Otaki, 5581 New Zealand | S348 | Support | Support in part submission point S348/049 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S348/049 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Tim Mansell and Family 20 Addington Road RD1 Otaki, 5581 New Zealand | S351 | Support | Support in part submission point S351/007 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S351/007 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|--|
| USNZ 20 Addington Road RD 1 Otaki, 5581 New Zealand | S349 | Support | Support in part submission point S349/007 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S349/007 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Bell Camp Trust 20 Addington Road RD 1 Otaki, 5581 New Zealand | S294 | Support | Support in part submission point S294/007 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S294/007 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Mahaki Holdings Ltd 20 Addington Road RD 1 Otaki, 5581 New Zealand | S370 | Support | Support in part submission point S370/007 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S370/007 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| NZ Transport Agency PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146 | Support | Support in part submission point S146/076 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of | Allow in part submission point S146/076, relating to Policy 4 to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|---|
| | | | | new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Properties Limited's submissions on the Plan. |
| Coastal Ratepayers United Incorporated 199 Manly Street Paraparaumu, 5032 New Zealand | S93 | Support | Support in part submission point S93/047 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S93/047 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| The Oil Companies Level 1, 2-8 Northcroft Street Po Box 33-817, Takapuna Auckland, 0740 New Zealand | S55 | Support | Support in part submission point S55/012 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S55/012 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Powerco Level 1, 2-8 Northcroft Street Po Box 33-817, Takapuna Auckland, 0740 New Zealand | S29 | Support | Support in part submission point S29/014 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited | Allow in part submission point S29/014 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|--|---|--|
| | | | | supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | |
| Federated Farmers of NZ PO Box 715 Wellington, 6140 New Zealand | S352 | Support | Support in part all of submission point S352/113 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S352/113 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | Support in part submission point S286/015 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S286/015 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Ravensdown Limited PO Box 51282 Tawa Wellington, 5249 New Zealand | S310 | Support | Support in part submission point S310/023 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S310/023 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|--|
| Kapiti Coast Airport Holdings Limited PO Box 2313 Wellington, 6140 New Zealand | S99 | Support | Support in part submission point S99/022 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S99/022 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council PO Box 2083 Wellington, 6140 New Zealand | S85 | Support | Support in part submission point S85/003 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S85/003 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Wellington Water Limited Private Bag 39804 Wellington Mail Centre Lower Hutt, 5045 New Zealand | S135 | Support | Support in part submission point S135/051 | CentrePort Properties Limited considers that the provision as notified is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. CentrePort Properties Limited supports the submission point to the extent it is consistent with CentrePort Properties Limited's original submission on this policy. | Allow in part submission point S135/051 relating to Policy 4, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Friends of the Paekakariki Stream and Rural Residents Environmental Society Inc | S112 | Oppose | Oppose all of submission point S112/037 | CentrePort Properties Limited considers that this provision is too restrictive, and does not take into account the benefits of new use | Disallow in whole submission point S112/037 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| 137 Tilley Road Paekakariki, 5034 | | | | and development, and where there are alternative means of addressing adverse effects. | |
| Atiawa ki Whakarongotai PO Box 509 Waikanae, 5250 New Zealand | S398 | Oppose | Oppose all of submission point S398/015 | CentrePort Properties Limited considers that this provision is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. | Disallow in whole submission point S398/015 |
| Nga Hapu o Otaki 24 Dunstan Street Otaki, 5512 New Zealand | S309 | Oppose | Oppose all of submission point S309/014 | CentrePort Properties Limited considers that this provision is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. | Disallow in whole submission point S309/014 |
| Ian Jensen 182 Te Hapua Road RD1 Otaki, 5581 New Zealand | S176 | Oppose | Oppose all of submission point S176/005 | CentrePort Properties Limited considers that this provision is too restrictive, and does not take into account the benefits of new use and development, and where there are alternative means of addressing adverse effects. | Disallow in whole submission point S176/005 |
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | Support all of submission point S286/001 | CentrePort Properties Limited supports the inclusion of new policy (or similar) in Section 4.2 Beneficial use and development that recognises the contribution existing urban areas, identified urban growth areas and infrastructure make to the social, economic and cultural wellbeing of people and communities and provide for their ongoing use and development. | Allow in whole submission point S286/001 |
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | Support all of submission point S286/005 | CentrePort Properties Limited supports a review of the use of the non-complying activity status where activities, structures and | Allow in whole submission point S286/005 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|---|
| | | | | infrastructure are an expected part of the environment and in areas that have been identified by territorial authorities as urban development areas | |
| CentrePort Limited PO Box 794 Hinemoa Street Wellington, 6140 | S121 | Support | Support all of submission point S121/043 | CentrePort Properties Limited supports the submission to include the words “and upgrading” in Policy 8(h) to allow the policy to appropriately recognise that beneficial activities in the coastal marine environment include the maintenance, use and upgrading of existing structures. | Allow in whole submission point S121/043 |
| Wellington Water Limited Private Bag 39804 Wellington Mail Centre Lower Hutt, 5045 New Zealand | S135 | Support | Support all of submission point S135/055 | CentrePort Properties Limited supports the submission to include the word “operation” in Policy 8(h) to allow the policy to appropriately recognise that beneficial activities in the coastal marine environment include the maintenance, use/operation and upgrading of existing structures. | Allow in whole submission point S135/055 |
| Coastal Ratepayers United Incorporated 199 Manly Street Paraparaumu, 5032 New Zealand | S93 | Support | Support all of submission point S93/049 | CentrePort Properties Limited supports the submission to include the word “upgrade” in Policy 8(h) to allow the policy to appropriately recognise that beneficial activities in the coastal marine environment include the maintenance, use/operation and upgrading of existing structures. | Allow in whole submission point S93/049 |
| Fish and Game PO Box 1325 Palmerston North, 4440 New Zealand | S308 | Oppose | Oppose all of submission point 308/047 | The submission seeks to amend Policy 8(h) to ensure that it is only structures which have a beneficial role in enhancing or protecting the habitat and its ecological values which are recognised as beneficial and generally appropriate. CentrePort Properties Limited | Disallow in whole submission point 308/047 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|-----------|--|--|---|
| | | | | opposes this submission as structures that do not enhance or protect habitat/ecological values can serve other beneficial purposes in the coastal marine environment and should be appropriately recognised and provided for. | |
| Joan Allin and Rob Crozier 47 Rodney Ave RD1 Otaki, 5581 New Zealand | S175 | Support | Support in part all of submission point S175/032 | CentrePort Properties Limited supports the submission to include the word “upgrade” in Policy 8(h) to allow the policy to appropriately recognise that beneficial activities in the coastal marine environment include the maintenance, use/operation and upgrading of existing structures. | Allow in whole submission point S175/032 |
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose all of submission point S279/075 | CentrePort Properties Limited opposes the deletion of Policy 8(h) as the policy appropriately recognises that beneficial activities in the coastal marine environment include the maintenance and use of existing structures | Disallow in whole submission point S279/075 |
| Royal Forest and Bird Protection Society PO Box 631 Wellington, 6140 New Zealand | S353 | Oppose | Oppose all of submission point S353/057 | CentrePort Properties Limited opposes the deletion of Policy 8(h) as the policy appropriately recognises that beneficial activities in the coastal marine environment include the maintenance and use of existing structures | Disallow in whole submission point S353/057 |
| Federated Farmers of NZ PO Box 715 Wellington, 6140 New Zealand | S352 | Support i | Support in part submission point S352/117 | CentrePort Properties Limited supports the proposed amendment to the beginning of Policy 8 as it will enable the policy to appropriately recognise that beneficial activities in the coastal marine environment include the maintenance and use of existing structures and the removal of dangerous or derelict structures, and that these activities should | Allow in part submission point S352/117 relating to the activities listed in the policy “shall generally be enabled” |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|--|
| | | | | generally be enabled. | |
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose all of submission point S279/079 | CentrePort Properties Limited considers that it is unnecessary to amend the policy to state where the benefit is accrued and that adverse effects of the operation, use, maintenance and upgrade can still have adverse effects on the environment and need to be managed. CentrePort Properties Limited also opposes the addition of a new policy to ensure that new, or increases in scale or extent of existing, regionally significant infrastructure and renewable energy generation facilities shall avoid causing adverse effects on sites in Schedules A to F, H and J. CentrePort Properties Limited considers that such a policy would be too restrictive of sustainable development and therefore inappropriate. | Disallow in whole submission point S279/079 |
| CentrePort Limited PO Box 794 Hinemoa Street Wellington, 6140 | S121 | Support | Support all of submission point S121/052 | CentrePort Properties Limited supports the submission seeking clarity as to why all of the CMA is defined as a High Hazard Area and its implications for effects based decision making. This is because this definition means that Policy 27 is inconsistent with policies that allow use and development in the Lambton Harbour Area, which is also a High Hazard Area by virtue of being in the coastal marine area. | Allow in whole submission point S121/052 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|--|
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | Support in part submission point S286/017 | CentrePort Properties Limited supports reconsideration of the definition of High Hazard Area so that it is appropriately based on an assessment of actual hazard. This is because this definition means that Policy 27 is inconsistent with policies that allow use and development in the Lambton Harbour Area, which is also a High Hazard Area by virtue of being in the coastal marine area. | Allow in part submission point S286/017, relating to the definition of High Hazard Areas |
| Masterton District Council C/ Geange Consulting PO Box 213 Carterton, 5743 New Zealand | S367 | Support | Oppose all of submission point S367/076 | CentrePort Properties Limited considers that the amendments do not sufficiently address the restrictive nature of the policy. The policy is inconsistent with other policies in the plan which recognise that use and development is appropriate in the Lambton Harbour Area. | Disallow submission point S367/076 |
| South Wairarapa District Council PO Box 6 Martinborough, 5741 New Zealand | S366 | Oppose | Oppose all of submission point S367/076 | CentrePort Properties Limited considers that the amendments do not sufficiently address the restrictive nature of the policy. The policy is inconsistent with other policies in the plan which recognise that use and development is appropriate in the Lambton Harbour Area. | Disallow submission point S367/076 |
| Wellington International Airport Ltd PO Box 489 Dunedin, 9054 New Zealand | S282 | Support | Support all of submission point S282/035 | CentrePort Properties Limited supports the submission to the extent that it recognises that the policy should be amended to provide for appropriate use and development in high hazard areas (for example, use and development in the Lambton Harbour Area). | Allow submission point S282/035 relating to Policy 27, to the extent that the amendments are not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|--|
| Coastal Ratepayers United Incorporated 199 Manly Street Paraparaumu, 5032 New Zealand | S93 | Support | Support in part submission point S93/104 | CentrePort Properties Limited supports the submission to the extent that it recognises that the policy should be amended to provide for appropriate use and development in high hazard areas (for example, use and development in the Lambton Harbour Area). | Allow in part submission point S93/104 relating to Policy 27, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Powerco Level 1, 2-8 Northcroft Street Po Box 33-817, Takapuna Auckland, 0740 New Zealand | S29 | Support | Support in part submission point S29/025 | The submission seeks the addition of a new subclause (j) recognising the need to maintain, replace or alter existing regionally significant infrastructure affixed to or otherwise dependent on heritage structures. CentrePort Properties Limited supports this amendment in part as it recognises heritage structures may have additional functions. | Allow in part submission point S29/025 relating to Policy 46, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| The Oil Companies Level 1, 2-8 Northcroft Street Po Box 33-817, Takapuna Auckland, 0740 New Zealand | S55 | Support | Support in part submission point S55/022 | The submission seeks the addition of a new subclause (j) recognising the need to maintain, replace or alter existing regionally significant infrastructure affixed to or otherwise dependent on heritage structures. CentrePort Properties Limited supports this amendment in part as it recognises heritage structures may have additional functions. | Allow in part submission point S55/022 relating to Policy 46, to the extent that the policy is not inconsistent with or contrary to the relief sought in CentrePort Properties Limited's submissions on the Plan. |
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | Support in whole submission point S286/021 | CentrePort Properties Limited considers that the listed outcomes may unduly constrain opportunities for otherwise appropriate redevelopment of historic heritage sites. It supports the submission to the extent that the policy is amended to recognise that it may not be necessary to meet all matters in the policy for development to be appropriate. | Allow submission point S286/021 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Oppose | Oppose in part submission point S286/024 | The Wellington City Council has sought an additional policy that recognises the need to maintain, upgrade or improve heritage infrastructure items to be resilient and adapt to the weather related effects of climate change and sea level rise. CentrePort Properties Limited is concerned this policy may be costly to implement and not warranted when considering the sustainable management purpose of the RMA. | Disallow in whole submission point S286/024 |
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose all of submission point S279/108 | The submission seeks to amend the plan, including Schedule E, to include a list of archaeological sites (that are appropriate for publication) of importance to mana whenua and provide protection for those sites via policies and rules in the Plan. CentrePort Properties Limited opposes this submission pending identification of the specific sites proposed to be included. | Disallow in whole submission point S279/108 |
| Wellington Civic Trust PO Box 10183 Wellington, 6143 New Zealand | S62 | Oppose | Oppose all of submission point S62/010 | The submission seeks to retain the policies unchanged and expand Schedules E1/E2. CentrePort Properties Limited has sought amendment of these policies to provide for the mixed use redevelopment of the Waterloo Quay and Interisland wharves, the Coastal Marine Area around the wharves and adjacent land areas. CentrePort Properties Limited opposes this submission point as it is inconsistent with the relief sought in its original submission on the Plan. | Disallow in whole submission point S62/010 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Oppose | Oppose all of submission point S286/022 | CentrePort Properties Limited opposes the submission as the amendment proposed will preclude appropriate redevelopment where structures are derelict and redundant. | Disallow in whole submission point S286/022 |
| Hamish Trolove 188 Whites Line East Waiwhetu Lower Hutt, 5010 New Zealand | S31 | Oppose | Oppose all of submission point S31/033 | The submission seeks amendment to recognise some derelict structures provide valuable habitat. CentrePort Properties Limited opposes this submission as it will preclude appropriate re-development of derelict structures. | Disallow in whole submission point S31/033 |
| Wellington Civic Trust PO Box 10183 Wellington, 6143 New Zealand | S62 | Oppose | Oppose all of submission point S62/011 | The submission seeks to retain the policies unchanged and expand Schedules E1/E2. CentrePort Properties Limited has sought amendment of these policies to provide for the mixed use redevelopment of the Waterloo Quay and Interisland wharves, the Coastal Marine Area around the wharves and adjacent land areas. CentrePort Properties Limited opposes this submission point as it is inconsistent with the relief sought in its original submission on the Plan. | Disallow in whole submission point S62/011 |
| Hamish Trolove 188 Whites Line East Waiwhetu Lower Hutt, 5010 New Zealand | S31 | Oppose | Oppose all of submission point S31/007 | The submission seeks amendment to recognise some structures provide valuable habitat and may be worth leaving in place in special circumstances. CentrePort Properties Limited opposes this submission as it will preclude removal of redundant structures. | Disallow in whole submission point S31/007 |
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New | S279 | Oppose | Oppose all of submission point S279/157 | The submission seeks to amend the policy and associated rules so that the sites listed in Schedules A-F are protected from inappropriate | Disallow in whole submission point S279/157 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|---|
| Zealand | | | | use and development. CentrePort Properties Limited opposes this amendment as it would unduly restrict appropriate use and development in the Lambton Harbour Area which would otherwise bring important economic, social or cultural benefits to central Wellington. | |
| Royal Forest and Bird Protection Society PO Box 631 Wellington, 6140 New Zealand | S353 | Oppose | Oppose all of submission point S353/126 | The submission seeks to add new provision (h) so that effects are managed in accordance with new Policy 41A. CentrePort Properties Limited considers the new Policy 41A is too restrictive and would preclude appropriate use and development. It opposes Policy 41A and the reference to it in Policy P132. | Disallow in whole submission point S353/126 |
| Coastal Ratepayers United Incorporated 199 Manly Street Paraparaumu, 5032 New Zealand | S93 | Support | Support in part submission point S93/062 | CentrePort Properties Limited supports the submission to the extent that it seeks amendment of the policy to reflect the fact that the coastal environment includes significant built areas. | Allow in part submission point S93/062, relating to recognition that the coastal environment includes significant built areas |
| Joan Allin and Rob Crozier 47 Rodney Ave RD1 Otaki, 5581 New Zealand | S175 | Support | Support in part submission point S175/048 | CentrePort Properties Limited supports the submission to the extent that it seeks amendment of the policy to reflect the fact that the coastal environment includes significant built areas. | Allow in part submission point S175/048, relating to recognition that the coastal environment includes significant built areas |
| Wellington International Airport Ltd PO Box 489 Dunedin, 9054 New Zealand | S282 | Support | Support in part submission point S282/048 | CentrePort Properties Limited supports the submission to the extent that it seeks amendment of the policy to delete the word "minimised" and replace it with "avoided, remedied or mitigated". CentrePort Properties Limited considers that this is consistent with the purpose of the RMA. | Allow in part submission point S282/048, relating to the deletion of the word "minimised" |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| NZ Transport Agency PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146 | Support | Support in part submission point S146/129 | CentrePort Properties Limited supports the submission to the extent that it seeks amendment of the policy to delete the word “minimised” and replace it with “avoided, remedied or mitigated”. CentrePort Properties Limited considers that this is consistent with the purpose of the RMA. | Allow in part submission point S146/129, relating to the deletion of the word “minimised” |
| NZ Transport Agency PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146 | Support | Support in part submission point S146/131 | CentrePort Properties Limited supports the submission because it recognises a seawall may be necessary to protect replacement infrastructure. | Allow in part submission point S146/131, relating to the inclusion of reference to replacement infrastructure and best practicable option, to the extent that it is not inconsistent or contrary to CentrePort Properties Limited’s submissions on the Plan |
| Hutt City Council Private Bay 31912 Lower Hutt, 5040 New Zealand | S84 | Support | Support in part submission points S84/005 and S84/021 | CentrePort Properties Limited supports the submission to the extent that it seeks amendment of the policy so that it does not unnecessarily and inappropriately constrain activities, and extends the ability to provide protective structures such as seawalls to existing types of infrastructure (not just regionally significant infrastructure). CentrePort Properties Limited considers that the policy as notified is unduly restrictive of potential new use and development in the coastal marine area. | Allow in part submission points S84/005 and S84/021, relating to the extension of Policy 139 to other types of infrastructure |
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | Support in part submission point S286/019 | CentrePort Properties Limited supports the submission to the extent that the policy should recognise that seawalls might be the only practical option to protect important community assets. | Allow in part submission point S286/019, relating to recognising seawalls may be necessary to protect important community assets |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|--|
| Anders and Emily Crofoot Castlepoint Station RD 9 Masterton 5889 New Zealand | S304 | Support | Support in part submission point S304/005 | CentrePort Properties Limited supports the deletion of the policy in the event that the relief it has sought in its submission on the Plan is not granted. | Allow in part submission point S304/005 relating to the deletion of the policy, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted |
| Coastal Ratepayers United Incorporated 199 Manly Street Paraparaumu, 5032 New Zealand | S93 | Support | Support in part submission point S93/064 | CentrePort Properties Limited supports the deletion of the policy and a replacement policy that recognises that seawalls may be appropriate to protect areas of significant existing development from natural hazards. | Allow in part submission point S93/064 relating to amendments to this policy, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted |
| Joan Allin and Rob Crozier 47 Rodney Ave RD1 Otaki, 5581 New Zealand | S175 | Support | Support in part submission point S175/050 | CentrePort Properties Limited supports the deletion of the policy and a replacement policy that recognises that seawalls may be appropriate to protect areas of significant existing development from natural hazards. | Allow in part submission point S175/050 relating to amendments to this policy, if the relief sought by CentrePort Properties Limited in relation to this policy is not granted |
| Site 10 Redevelopment Limited Partnership c/- Willis Bond & CO Limited Level 2, 5 Cable Street Wellington, 6142 New Zealand | S160 | Support | Support in part submission point S160/001 | CentrePort Properties Limited supports the submission in part, provided that it is consistent with the relief sought in CentrePort Properties Limited's submissions on the Plan. CentrePort Properties Limited considers that development of the Waterloo Quay and Inter-Island wharves should be provided for in the Plan. | Allow in part submission point S160/001 relating to development of Waterloo and the Inter-Island Wharves for a use other than operational port activities |
| Site 10 Redevelopment Limited Partnership c/- Willis Bond & CO Limited Level 2, 5 Cable Street Wellington, 6142 New Zealand | S160 | Oppose | Oppose all of submission point S160/003 | Site 10 Redevelopment Limited Partnership seeks express incorporation of the Wellington City Council district plan provisions as regards the Lambton Harbour Area (LHA) and adoption of the Wellington Waterfront framework as the guiding document for the LHA. Recognition of the WCC central area design guide as regards to LHA in particular the stepping down | Disallow submission point S160/003 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|---|
| | | | | <p>of the high city in the CBD to the low city at the city edges (including the waterfront).</p> <p>CentrePort Properties Limited notes this policy does not refer to Schedule E (Historic Heritage) which is the focus of CentrePort Properties Limited's submission, and no submitter has sought Schedule E be referenced in Policy 138. Nevertheless, it is unclear if the Inter-Island (Railway) Wharf and the Waterloo Quay Wharf are in some of the other sites with significant values. If so, CentrePort Properties Limited has sought they be removed. If these are not removed then CentrePort Properties Limited opposes the relief sought by Site 10 Redevelopment Limited Partnership because there should be tailored provisions for the Lambton Harbour Area (Northern Zone).</p> | |
| Wellington Civic Trust PO Box 10183 Wellington, 6143 New Zealand | S62 | Oppose | Oppose all of submission point S62/023 | CentrePort Properties Limited opposes the inclusion of a specific mention of the Wellington Waterfront Framework 2001 in Policy 142(j) as this document is over 15 years old and may not reflect the community's current vision and values for this area. | Disallow in whole submission point S62/023 |
| Wellington City Council PO Box 2199 Wellington, 6140 New Zealand | S286 | Support | Support all of submission point S286/035 | CentrePort Properties Limited agrees that in order for use and development in the Lambton Harbour Area to be appropriate it should not have to satisfy all of the listed matters. | Allow in whole submission point S286/035 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|--|
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose submission point 279/161 | CentrePort Properties Limited opposes the submission to the extent that it seeks amendment of the policy to and associated rules to direct that any of the exceptions in (b) to (d) must be managed to avoid adverse effects on the sites and their associated values. CentrePort Properties Limited considers that this is too restrictive and would preclude appropriate use and development in the Lambton Harbour Area. | Disallow in whole submission point 279/161 |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council PO Box 2083 Wellington, 6140 New Zealand | S85 | Support | Support submission point S85/066 | CentrePort Properties Limited supports this submission to the extent that it aims to make the requirements of the policy less absolute and provide for reclamation for other appropriate purposes. CentrePort Properties Limited considers that the Proposed Plan needs to recognise that commercial developments in the coastal marine area can bring important economic, social or cultural benefits, and that reclamation, drainage or destruction may be needed in order to provide for those activities. | Allow in whole submission point S85/066 |
| Mt Victoria Residents Association 29 Moir Street Mt Victoria Wellington, 6011 New Zealand | S162 | Oppose | Oppose all of submission point S162/013 | CentrePort Properties Limited opposes the submission point which seeks to make the policy and associated rules more stringent. CentrePort Properties Limited considers that the policy and associated rules are already too restrictive, and the amendments sought fail to achieve the purpose of the RMA. | Disallow in whole submission point S162/013 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|--|
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose in part submission point S279/163 | CentrePort Properties Limited opposes the submission point as it is too restrictive. The Proposed Plan needs to recognise that commercial developments in the coastal marine area can bring important economic, social or cultural benefits, and that reclamation, drainage or destruction may be needed in order to provide for those activities, and that this may have adverse effects on natural character, water quality, aquatic ecosystems and identified significant sites in Schedules A-F. To require that those affects are avoided is unreasonable and unduly restrictive. | Disallow in whole submission point S279/163 |
| 5.7 Rules – Coastal Management | | | | | |
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose all of submission point S279/213 | The submission seeks that rules that do not require discretionary or non-complying consent for activities within sites identified in Schedules A-F are amended or added to do so. CentrePort Properties Limited opposes this amendment, as this is too restrictive, and some activities are more appropriately provided for as restricted discretionary, controlled or permitted activities. | Disallow in whole submission point S279/213 |
| Royal Forest and Bird Protection Society PO Box 631 Wellington, 6140 New Zealand | S353 | Oppose | Oppose all of submission point S353/158 | The submission seeks to amend the Schedules to ensure that they apply to the coastal environment and not to the CMA. CentrePort Properties Limited considers that reference to the coastal environment is inappropriate as the area affected by the Schedules | Disallow in whole submission point S353/158 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|--|---|--|
| | | | | would be too great. | |
| Royal Forest and Bird Protection Society PO Box 631 Wellington, 6140 New Zealand | S353 | Oppose | Oppose where relevant submission point S353/160 | The submission seeks to retain the rules in 5.7.3 of the Plan. In its submissions on the Plan, CentrePort Properties Limited seeks amendments to a number of rules in 5.7.3, and so opposes the retention of those rules where relevant. | Disallow in whole submission point S353/160 |
| NZ Transport Agency PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146 | Support | Support all of submission point S146/194 | CentrePort Properties Limited supports the amendments to these rules to the extent that is consistent with CentrePort Properties Limited's submissions on the Plan. CentrePort Properties Limited considers that it is appropriate to more readily provide for some maintenance and repair as a permitted activity. | Allow in whole submission point S146/194 |
| Chorus New Zealand Limited P O Box 632 Wellington 6140 New Zealand | S144 | Support | Support all of submission point S144/029 | CentrePort Properties Limited agrees that the rule should be amended to clearly define thresholds for minor additions or alterations to structures. | Allow in whole submission point S144/029 |
| Spark Trading New Zealand Limited Private Bag 92029 Level 4 Purple Spark City 167 Victoria Street West Auckland 1010 New Zealand | S98 | Support | Support all of submission point S98/028 | CentrePort Properties Limited agrees that the rule should be amended to clearly define thresholds for minor additions or alterations to structures. | Allow in whole submission point S98/028 |
| The Minister of Conservation RMA Shared Services, Department of | S75 | Oppose | Oppose all of submission point S75/161 | CentrePort Properties Limited opposes the suggested activity statuses for situations where the conditions in Rule 151 cannot be | Disallow in whole submission point S75/161 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|---|--|
| Conservation, Private bag 3072, Hamilton 3240, New Zealand | | | | met, as this is considered to be too onerous. | |
| NZ Transport Agency PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146 | Support | Support in part submission point S146/201 | CentrePort Properties Limited supports the suggested amendment but seeks that the proposal is extended beyond “where there is a function and operational need” to include where the structure is located in the Lambton Harbour Area. | Allow in part submission point S146/201, relating to adding a new rule to provide for new structures, additions or alterations to a structure and the associated use of the structure inside a site of significance as a discretionary activity |
| The Minister of Conservation RMA Shared Services, Department of Conservation, Private bag 3072, Hamilton 3240, New Zealand | S75 | Oppose | Oppose all of submission point S75/166 | CentrePort Properties Limited opposes the addition of a reference to Schedule E in condition (f) as this would unduly constrain the use and development of CentrePort Properties Limited’s wharves in the Lambton Harbour Area. | Disallow in whole submission point S75/166 |
| The Minister of Conservation RMA Shared Services, Department of Conservation, Private bag 3072, Hamilton 3240, New Zealand | S75 | Oppose | Oppose all of submission point S75/167 | CentrePort Properties Limited opposes the addition of a reference to Schedule E within the matters of discretion as this should not be the focus of any decision. | Disallow in whole submission point S75/167 |
| Chorus New Zealand Limited P O Box 632 Wellington 6140 New Zealand | S144 | Support | Support all of submission point S144/030 | CentrePort Properties Limited agrees that the rule should be amended to clearly define thresholds for minor additions or alterations to structures. | Allow in whole submission point S144/030 |
| Spark Trading New Zealand Limited Private Bag 92029 Level 4 Purple Spark City 167 Victoria Street West Auckland 1010 New Zealand | S98 | Support | Support all of submission point S98/029 | CentrePort Properties Limited agrees that the rule should be amended to clearly define thresholds for minor additions or alterations to structures. | Allow in whole submission point S98/029 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|--|
| The Minister of Conservation RMA Shared Services, Department of Conservation, Private bag 3072, Hamilton 3240, New Zealand | S75 | Oppose | Oppose all of submission point S75/161 | The submission seeks the removal of 'additions and alterations' of existing coastal structures from Rules R161 and R162, to ensure that these activities are solely managed by Rules in Section 5.7.3. CentrePort Properties Limited opposes the submission on the basis that the rules are designed to manage different matters. | Disallow in whole submission point S75/161 |
| The Minister of Conservation RMA Shared Services, Department of Conservation, Private bag 3072, Hamilton 3240, New Zealand | S75 | Oppose | Oppose all of submission point S75/169 | The submission seeks that Rule R164 apply to the replacement of parts of structures that do not comply with Rule R163. CentrePort Properties Limited considers that the replacement of parts of structures should be a permitted activity. | Disallow in whole submission point S75/169 |
| The Minister of Conservation RMA Shared Services, Department of Conservation, Private bag 3072, Hamilton 3240, New Zealand | S75 | Oppose | Oppose all of submission point S75/170 | The submission seeks that Rule R164 apply to the replacement of parts of structures that do not comply with Rule R163. CentrePort Properties Limited considers that the replacement of parts of structures should be a permitted activity. | Disallow in whole submission point S75/170 |
| Joan Allin and Rob Crozier 47 Rodney Ave RD1 Otaki, 5581 New Zealand | S175 | Support | Support in part submission points S175/066 and S175/063 | CentrePort Properties Limited supports this submission to the extent that it recognises that seawalls may be appropriate to protect areas of significant existing development from natural hazards. | Allow in part submission points S175/066 and S175/063, relating to seawalls |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council PO Box 2083 Wellington, 6140 New Zealand | S85 | Support | Support in part submission point S85/084 | CentrePort Properties Limited supports the amendment of the rules relating to heritage structures to make them less onerous to the extent set out in CentrePort Properties Limited's submissions on the Plan. | Allow in part submission point S85/084 relating to the rules on heritage structures |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|---|--|
| Mt Victoria Residents Association 29 Moir Street Mt Victoria Wellington, 6011 New Zealand | S162 | Oppose | Oppose all of submission point S162/012 | CentrePort Properties Limited considers that it is appropriate to provide for some alteration to heritage structures as a permitted activity, and it is unnecessary to amend the description of Schedule E1 as suggested. | Disallow in whole submission point S162/012 |
| Powerco Level 1, 2-8 Northcroft Street Po Box 33-817, Takapuna Auckland, 0740 New Zealand | S29 | Support | Support all of submission point S29/055 | CentrePort Properties Limited supports the amended to Rule R168 as it is appropriate to provide for some alteration to heritage structures as a permitted activity, including services attached to a heritage structure. | Allow in whole submission point S29/055 |
| The Oil Companies Level 1, 2-8 Northcroft Street Po Box 33-817, Takapuna Auckland, 0740 New Zealand | S55 | Support | Support all of submission point S55/064 | CentrePort Properties Limited supports the amended to Rule R168 as it is appropriate to provide for some alteration to heritage structures as a permitted activity, including services attached to a heritage structure. | Allow in part in whole submission point S55/064 |
| NZ Transport Agency PO Box 5084 Lambton Quay Wellington, 6145 New Zealand | S146 | Oppose | Oppose all of submission point S146/209 | The submission seeks to delete the matters of control in Rule R183 and replace them with a matter of control: "If enabled by the existing structure, public access is not restricted other than temporarily for health and safety reasons". While CentrePort Properties Limited supports controlled activity status for the renewal of existing resource consents for occupation of space by structures given the significant investment in such structures and the operations they support, CentrePort Properties Limited considers the proposed matter of control unduly restrictive as it may be necessary to restrict public access beyond just a temporary | Disallow in whole submission point S146/209 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|----------------------------|----------|---|--|--|
| | | | | basis. | |
| Wellington International Airport Ltd PO Box 489 Dunedin, 9054 New Zealand | S282 | Oppose | Oppose all of submission point S282/067 | CentrePort Properties Limited considers discretionary activity status is appropriate for occupation of space in the coastal marine area which is otherwise not permitted. As such, it opposes the deletion of this rule. | Disallow in whole submission point S282/067 |
| Wellington International Airport Ltd PO Box 489 Dunedin, 9054 New Zealand | S282 | Support | Support all of submission point S282/074 | CentrePort Properties Limited supports a review of the relationships between Rules R165, R166, R194, R204, R208, R210 and R216 to ensure that unnecessary duplication of control is avoided and that an all-inclusive non-complying activity status is not applied to activities that are otherwise provided for by the Proposed Plan. | Allow in whole submission point S282/074 |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council PO Box 2083 Wellington, 6140 New Zealand | S85 | Support | Support all of submission point S85/067 | CentrePort Properties Limited supports an amendment of the Plan to broaden the circumstances where reclamation is appropriate to include reasons other than regionally significant infrastructure. In particular, CentrePort Properties Limited considers that Rule R214 should be amended to provide for appropriate development in the Lambton Harbour Area (Northern Zone). | Allow in whole submission point S85/067 |
| Hutt City Council Private Bay 31912 Lower Hutt, 5040 New Zealand | S84 | Support | Support all of submission point S84/030 | CentrePort Properties Limited supports a change in activity status from non-complying activity to discretionary. This is consistent with the relief sought in CentrePort Properties Limited's original | Allow in whole submission point S84/030 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|---|
| | | | | submission on the Plan. | |
| Roading, Parks and Gardens and Solid Waste departments of Hutt City Council and Upper Hutt City Council PO Box 2083 Wellington, 6140 New Zealand | S85 | Support | Support all of submission point S85/068 | CentrePort Properties Limited supports an amendment of the Plan to broaden the circumstances where reclamation is appropriate to include reasons other than regionally significant infrastructure. In particular, CentrePort Properties Limited considers that Rule R214 should be amended to provide for appropriate development in the Lambton Harbour Area (Northern Zone). | Allow in whole submission point S85/068 |
| Wellington International Airport Ltd PO Box 489 Dunedin, 9054 New Zealand | S282 | Support | Support all of submission point S282/079 | CentrePort Properties Limited supports the deletion of Rule R216 as it considers that destruction of the foreshore and seabed should be assessed as discretionary activity not non-complying. This is consistent with the relief sought in CentrePort Properties Limited's original submission on the Plan. | Allow in whole submission point S282/079 |
| 12. Schedules/related general submission points | | | | | |
| Porirua City Council PO Box 50-218, 16 Cobham Court, Porirua | S163 | Support | Support all of submission point S163/016 | CentrePort Properties Limited agrees that sites of significance within a modified urban environment require a different policy and management approach to sites located in an unmodified or more natural environment. | Allow in whole submission point S163/016 |
| Carterton District Council, PO Box 9 Carterton, 5743 | S301 | Support | Support all of submission point S301/007 | CentrePort Properties Limited considers that the non-complying activity status of activities within areas identified within any of the Schedules to the Plan is not justified in all instances, and should | Allow in whole submission point S301/007 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|--|
| | | | | be amended as sought by the Council. | |
| Coastal Ratepayers United Incorporated 199 Manly Street Paraparaumu, 5032 New Zealand | S93 | Support | Support all of submission point S93/057 | CentrePort Properties Limited supports in principle that the extent of the areas identified in the schedules should be limited or qualified, and the policies revised so that they are less extreme and focus on the attributes of the areas that create the value. | Allow in whole submission point S93/057 |
| Royal Forest and Bird Protection Society PO Box 631 Wellington, 6140 New Zealand | S353 | Oppose | Oppose all of submission point S353/179 | CentrePort Properties Limited opposes the extension of Schedules F4 and F5 to include sites within the coastal environment as this may constrain the use and development of CentrePort Properties Limited's wharves in the Lambton Harbour Development Area if these schedules are considered to apply to the wharves. | Disallow in whole submission point S353/179 |
| Heritage NZ PO Box 2629 Wellington, 6140 New Zealand | S94 | Oppose | Oppose all of submission point S94/014 | CentrePort Properties Limited opposes the retention of the historic heritage schedules. In particular, it seeks to remove Inter-Island (Railway) Wharf and the Waterloo Quay Wharf from Schedule E2: Historic heritage (wharves and boatsheds) and all associated maps. | Disallow in whole submission point S94/014 |
| Rangitane o Wairarapa Inc 12 Kokiri Place PO Box 354 Masterton, 5810 New Zealand | S279 | Oppose | Oppose all of submission point S279/223 | The submission seeks to add archaeological sites and historic heritage sites of significance to mana whenua. CentrePort Properties Limited opposes this submission pending identification of the specific sites proposed to be included. | Disallow in whole submission point S279/223 |

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|---|----------------------------|----------|---|--|--|
| Royal Forest and Bird Protection Society PO Box 631 Wellington, 6140 New Zealand | S353 | Oppose | Oppose all of submission point S353/176 | CentrePort Properties Limited opposes the retention of Schedule E. In particular, it seeks to remove Inter-Island (Railway) Wharf and the Waterloo Quay Wharf from Schedule E2: Historic heritage (wharves and boatsheds) and all associated maps. | Disallow in whole submission point S353/176 |
| Wellington Civic Trust PO Box 10183 Wellington, 6143 New Zealand | S62 | Oppose | Oppose all of submission point S62/024 | CentrePort Properties Limited does not consider it is appropriate to recognise and provide for the parts of the wharf edges and reclamation edges which are currently protected under the Regional Coastal Plan as part of the sites of historic heritage values in the Proposed Plan. | Disallow in whole submission point S62/024 |
| 13. Maps | | | | | |
| Strait Shipping Limited Level 5, 120 Featherston Street, PO Box 1144, Wellington, 6140, New Zealand | S168 | Oppose | Oppose all of submission point 168/001 | CentrePort Properties Limited opposes the amendment of Map 32 to rezone the Lambton Harbour Area (Northern Zone) comprising of the Inter-Island and Waterloo Wharves as Commercial Port Area, or any alternative relief sought by the submitter. CentrePort Properties Limited supports the inclusion of the area surrounding and including the Waterloo Quay Wharf and the Inter-Island Wharf (also known as the Railway Wharf) in the Lambton Harbour Area (Northern Zone), but also seeks to apply the Commercial Port Area to the wharves for as long as they remain utilised for port operations. | Disallow in whole submission point 168/001 |

If you require more space for additional comments, please insert new rows as needed

| Details of the submission you are commenting on | Original submission number | Position | Part(s) of the submission you support or oppose | Reasons | Relief sought |
|--|-----------------------------------|-----------------|--|----------------|----------------------|
|--|-----------------------------------|-----------------|--|----------------|----------------------|

Submitter ID:

File No:



greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

Further Submission

on Proposed Natural Resources Plan
for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (**PNRP**). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website:
www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

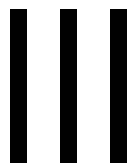
Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156



Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

| Details of the submission you are commenting on Name of person/ group making original submission and postal address. | Original submission number The original submission number can be found on the submitter address list. | Position Whether you support or oppose the submission. | Part(s) of the submission you support or oppose Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions. | Reasons Why you support or oppose each submission point. | Relief sought The part or whole of each submission point you wish to be allowed or disallowed. |
|--|---|--|--|--|--|
| e.g. Joanne Bloggs 12 Pine Tree Avenue Redwood | e.g. submitter S102 | e.g. Oppose | e.g. Oppose all of submission point S102/41 | e.g. The submission point does not recognise... | e.g. Disallow the parts of S102/41 relating to... |
| | | | | | |

If you require more space for additional comments, please click on the comment box on the following page.

**FURTHER SUBMISSION ON THE PROPOSED NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION PREPARED
ON BEHALF OF THE FERTILISER ASSOCIATION OF NEW ZEALAND**

| Name of submitter and postal address | Submission Number | Position | Part(s) of the submission that are supported or opposed | Reasons | Relief sought |
|---|--------------------------|-----------------|---|--|---|
| Oil Companies C/ Burton Planning Consultants Limited PO Box 33-817 Takapuna Auckland 0740 | S55 | Support | The conditions of existing resource consents for discharges of contaminants to fresh or coastal water, and to take and use water, may be reviewed pursuant to section 128 of the Resource Management Act 1991 <u>where evidence can be produced of adverse effects attributable to the exercise of the consent.</u> | There is the potential for several plan changes to be initiated through Whaitua committee initiatives during the typical term of a consent. This may reduce certainty to existing consent holders and affect investment decisions. The frequency and scope of the effect of plan changes on existing consents should be limited to s128(a)(i). | Accept the submission in full. |
| Hutt City Council Allison Tindale Private Bag 31912 Lower Hutt 5040 | S84 | Support. | Provide a map of the habitats with significant indigenous biodiversity values. | FANZ supports this amendment as it aides understanding and interpretation of the Plan. | Accept the submission in full. |
| Waste departments of Hutt City Council and Upper Hutt City Council C/ Tonkin & Taylor Ltd PO Box 2083 Wellington 6140 | S85 | Support. | Inserting clear and frequent references between these chapters. | The Whaitua chapters are not well integrated into the PNRP. There is no cross-referencing to the Whaitua chapters particularly in Chapter 5. FANZ supports this amendment as it aides understanding and interpretation of the Plan. | Accept the submission in full. |
| Wellington Regional Council PO Box 11646 Manners Street Wellington 6142 | S133 | Support in part | Rule R42 Amend to include a condition that does not permit the discharge of hazardous substances. | FANZ understands that Rule R42 is only intended to allow minor discharges where it is not provided for by any other rule. However, FANZ is concerned that the term | Accept the submission provided that it does not capture fertiliser. |

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| | | | | hazardous substances could inadvertently capture fertilisers. | |
| Regional Public Health Dr Jill McKenzie Private Bag 31907 Lower Hutt | S136 | Oppose | Rule R82 add new clause: (d) the discharge is not into an area with existing elevated groundwater nitrate levels. | <p>FANZ is concerned with the phrase 'elevated groundwater nitrate levels' and considers that it needs to be quantified i.e. does it mean nitrate levels that exceed the drinking water standard or simply above natural background levels.</p> <p>FANZ notes that fertiliser applied following good management practice does not necessarily result in excessive leaching loss to ground water. Furthermore, nutrient loss to groundwater can be from a variety of sources, and requires a catchment and systems based management approach. Simply prohibiting fertiliser will not address the issue raised in the submission.</p> | Reject the submission. |
| Vector Gas C/ Beca Ltd PO Box 3942 Wellington Hywel Edwards | S145 | Support | Provide a mechanism for industry representation, including infrastructure providers, to be involved in the whitua committees especially in the context of regulatory mechanisms e.g. the development/progression of plan changes. | FANZ supports the representation of industry groups including primary industry on the whitua committees to ensure proposed rules are workable. | Accept the submission in full. |
| Porirua City Council Harriet Shelton PO Box 50218 Porirua | S163 | Support in part | Schedule F5 Add the following to the second paragraph under descriptor: 'Seagrass is also vulnerable to high levels of nutrients, particularly nitrogen'. | Whilst there is some research that supports this statement, there is also research that states the effects of nutrients on seagrass are uncertain | If the submission is accepted amend to read: Seagrass is <u>may</u> also <u>be</u> vulnerable to |

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| | | | | and it may depend on the species. | high levels of nutrients, particularly nitrogen'. |
| D.A.Neal Taki Taki 1791 Whangaehu Valley Rd RD6 Masterton 5886. | S278 | Oppose | Logic would suggest incorporating the following into the plan: A) Set targets in bands to allow natural variability in measurements e.g. after major floods. B) Study measurements to pick trends (up, down or stable) and prioritise resources to those trends. C) Review targets on a regular basis to ensure relevance to current science and incorporate mechanism in the plan to change those targets. | FANZ is sympathetic to the intent of the submission to manage Periphyton levels that are set using 'imperfect science'. However, FANZ is concerned as to how the band of targets would be determined and implemented in practice. FANZ is also concerned about the lack of certainty provided to land users if targets are reviewed and amended on a regular basis. | Accept the intent of the submission in so far as it seeks to manage natural variability in Periphyton levels, and manage activities according to improved science. Oppose regular review and regular changes to targets. |
| Rangitāne Tū Mai Rā Trust and Rangitāne o Wairarapa Inc. 12 Kokiri Place PO Box 354 Masterton 5810 Horipo Rimene. | S279 | Oppose | 1.4 Integrated Catchment Management Include a comprehensive list of known values of water by adding to Table 1.1) and amend the objectives, policies and other provisions of the Plan to align with achieving outcomes that will provide for those values. | FANZ notes Table 1.1 sets high level values, and the submitter's concerns that the Council has not comprehensively identified the values as part of developing the Proposed Plan. FANZ considers that the Plan as currently proposed gives effect to the values through the objectives, policies and methods in the Plan. Integrated management must accurately interpret and provide for the values with guidance provided to the Whaitua Committees in setting targets. Any values that are added to Table 1.1 and consequential amendments to objectives | Oppose the submission in so far as it seeks that the Plan identifies a list of values in addition to those in Table 1.1. Support is given to interpretation of values or an additional table providing a refinement of these values with full stakeholder engagement that would guide the Whaitua Committees in setting targets and assist in achieving the integrated management approach identified in the Proposed Plan. |

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| | | | | policies and any other provision in the plan will require further, full stakeholder engagement. | |
| | | Oppose | New policy and associated rules that direct how freshwater quality will be maintained in a state at least as good as it was at the time the review of the regional plan was initiated. This policy should be directive in terms of managing both point source and diffuse contributions of contaminants to water. | The Plan as notified already contains policies and rules that are intended to maintain and improve water quality. | Reject the submission in full. |
| Horticulture NZ PO Box 10 232 Wellington | S307 | Support in part | New Objective in 3.1 <u>Natural and physical resources are managed to provide an appropriate balance across values and uses in a catchment.</u> | FANZ understands the submission to be seeking to balance consideration of uses and values. FANZ supports this approach as it is important that values are not always protected to the detriment of economic uses. | Amend the proposed objective as follows: Natural and physical resources are managed to provide an appropriate balance across of maintaining and protecting values and <u>providing for</u> uses in a catchment. |
| | | Support | Rule R82. Amend Rule R82 to add the following new clause: <u>The applications will be undertaken using good management practices to minimise the potential for wind drift having regard to the Code of Practice for Nutrient Management (Fertiliser Association).</u> | FANZ supports the more practical approach to managing wind drift. This could be expanded to include The Code of Practice for Placement of Fertiliser in New Zealand (otherwise known as The Spreadmark Code of Practice) | Accept the submission and expand to include The Code of Practice for Placement of Fertiliser in New Zealand (otherwise known as The Spreadmark Code of Practice). |
| | | Support | New Method Development of good management practices <u>The Council will work with industries and relevant stakeholders to develop good management practices that provide for</u> | FANZ supports a collaborative approach to developing good management practices. | Accept the submission in full. |

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| | | | <u>robust and reasonable tools to manage activities regulated through the Plan.</u> | | |
| Wellington Fish and Game Council PO Box 1325 Palmerston North 4440 Attention: Phil Teal. | S308 | Oppose | Include a definition of 'natural productive capability of land and soils: <u>'An allocation based on the productive capacity of the land including soil type, slope and rainfall. It is tied to the land rather than existing land uses. The Natural Capital based allocation is the most economically efficient allocation approach and provides the greatest nutrient loss to the elite soils that will produce the most per kg of N loss/Ha/yr.'</u> | Natural capital based allocation is an alternative approach to the allocation regime proposed in the PWNRP. FANZ considers that such an approach would require substantial changes to the provisions of the proposed Natural Resources Plan for Greater Wellington Region. The changes may be so different as to require re-notification of parts of the Plan. | Reject the submission in full |
| | | Oppose | Include objectives, policies and standards and where applicable rules which recognise and protect regional sports fish and gamebird populations and their habitats, and which recognise and provide for recreational hunting and angling. | FANZ is concerned as to the extent and implications of any such objectives, policies and standards. Furthermore the Plan provisions seek to maintain, enhance and manage water quality, thereby ensuring water quality that is capable of supporting recreational use and providing habitats. FANZ also suggests that once drafted, any such additions would need to be publicly notified. | Reject the submission in full. |
| | | Oppose | Amend Objective 023 or include new objective as follows: <u>Water quality of aquifers, lakes, rivers, natural wetlands and coastal water is managed to ensure that:</u> 1. <u>Water quality is maintained where the existing water quality is at a level</u> | The intent of the submission is provided for through the notified provisions and amendments sought by FANZ. | Reject the submission in full. |

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| | | | <p><u>sufficient to support the values of freshwater (listed)</u></p> <p>2. <u>Water quality is restored where the existing water quality is not at a level sufficient to support the values of freshwater (listed)]</u></p> <p>3. <u>Accelerated eutrophication and sedimentation of waterbodies in the region is prevented.</u></p> <p>4. <u>The special values of waterbodies protected by water conservation orders are maintained or where degraded are restored.</u></p> | | |
| | | Support in part | <p>Section 3.5 and 3.6</p> <p>Add a new objective as follows: <u>The quality and quantity of groundwater is managed through land use provisions and rules to ensure that groundwater continues to provide a sustainable source of high quality water, and surface flow recharge, to protect the life supporting capacity, ecological health and cultural and recreational values of freshwater bodies.</u></p> <p><u>Amend table 3.6 to delete the narrative in relation to nitrate levels and replace with numerical states for acceptable groundwater drinking concentrations, and insert requirements to maintain water quality and quantity, and where degraded such that the ecosystem health of connected surface waterbodies is impacted, groundwater quality and quantity is improved.</u></p> | <p>FANZ supports the inclusion of a specific objective on groundwater quality as long as this is balanced with the consideration of use for economic activities.</p> <p>FANZ also supports the introduction of numerical states in Table 3.6 for nitrate levels in water as long as these are practicable and enable the use of land for primary production. FANZ presumes that such values would be subject to an s32 analysis.</p> <p>In general, FANZ supports numeric values as they provide a level of certainty that narrative statements do not.</p> | <p>Accept the submission to introduce a new objective as long as it is balanced with the ability to use groundwater and enables primary production land uses.</p> <p>Also accept the introduction of numeric nitrate levels in Table 3.6 as long as this is undertaken in consultation with all relevant parties and subject to analysis under s32.</p> |
| | | Support in part | <p>Section 5.4</p> <p>Include new rules which ensure that</p> | <p>Bullet point one: FANZ is concerned that this is a substantial change from the</p> | <p>Accept the submission in part.</p> |

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| | | | <ul style="list-style-type: none"> • <u>farming activities comply with a sustainable nitrogen leaching rate which is based on allocating the total allowable load of nitrogen for the sub catchments, water management zone or catchment to the land on the basis of either a flat per hectare allocation of nitrogen leaching, or a nitrogen leaching allowance per hectare based on an allocation on a land use capability class basis or some other methodology, which achieves the efficient use of natural resources.</u> • <u>require farms to comply with specified management practices which minimise or reduce the loss of nitrogen, Phosphorus, sediment and faecal contamination including, but not limited to, the requirement to seal effluent ponds and to practice deferred irrigation, good management practices for the application of fertiliser and other nutrient sources including setbacks from waterbodies, permanent fencing and planting of riparian margins, good management practices for earthworks and cultivation including setbacks from waterbodies to avoid or minimise sediment run off to water.</u> • <u>nutrient budgets are to be prepared annually by a person who has completed both the "Intermediate" and the "Advanced" courses in "Sustainable Nutrient Management in New Zealand Agriculture" conducted</u> | <p>approach to nutrient management in the PWNRP. It would have significant practical implications for land users.</p> <p>Bullet point two: FANZ supports the application of Industry Agreed Good Management Practices.</p> <p>Bullet point three: Where nutrient budgets are required for regulatory purposes, FANZ supports these being prepared by a Certified Nutrient Management Adviser, but opposes nutrient budgets being prepared annually as they should be valid for 3 years unless there has been a change to the farm system.</p> <p>Bullet point five: To apply a prohibited status is very stringent and does not recognise the possibility of changes in N and P concentrations in water bodies as well as the ability to manage such losses by way of industry agreed good management practice.</p> <p>Bullet point six: FANZ understands that there is some anxiety around nutrient trading in the farming</p> | <p>FANZ opposes bullet points one, three (in particular the annual preparation of farm management plans) and five.</p> <p>FANZ supports the use of Industry Agreed Good Management Practices (bullet point two), nutrient budgets being prepared by Certified Nutrient Management Advisors (bullet point three) and has an interest in nutrient trading, recognising it as a future option subject to the need to address a number of technical requirements (bullet point six).</p> <p>FANZ also supports in part the allocation principals identified in Appendix 11 of the submission but suggests caution in the application of natural capital allocation.</p> |
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| | | | <p><u>by Massey. University and provided to the regional council. The information shall be provided in an electronic format compatible with regional councils information Systems and may include but shall not be limited to the following report from Overseer or their equivalent iff an alternative model is used (must be accredited for use by the regional council): Nutrient Budget Nitrogen, Phosphorus, Summary, Nitrogen Overview</u></p> <ul style="list-style-type: none"> • <u>exclude all livestock from rivers, lakes and wetlands and to culvert or bridge all regular stock crossings.</u> • <u>provide for consent applications for new or intensified (a use that increases loss of nitrogen or phosphorus) use of production in sub catchments that are currently over allocated for nitrogen or phosphorus to be a prohibited activity.</u> • <u>Provide for trading of nitrogen or phosphorus loss rates between production land uses or properties in the same sub catchment so long as the nutrient load and the freshwater objectives in tables 3.4 and 3.4a, 3.5 and 3.6, and the limits/ standards are not breached at any point within that sub catchment1 or water management unit.</u> | <p>community that is likely being compounded by on-going changes in OVERSEER outputs as new versions are released and by uncertainty in catchment modelling. However FANZ acknowledges that some form of trading is likely in the future.</p> <p>FANZ supports the use of Farm Management Plans, noting that Appendix 10 is cut and paste from the Canterbury Land and Water Plan.</p> <p>FANZ supports the intent of the allocation principals in Appendix11 noting Beef and Lamb's support for the natural capital based allocation approach. As noted previously, this approach would require substantial changes to the proposed Natural Resources Plan for Greater Wellington Region. The changes may be so different as to require re-notification of parts of the Plan.</p> | |
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| | | | <ul style="list-style-type: none"> • <u>Ensure that the rules include both land use and ancillary discharge provisions (section 9 and section 15 RMA).</u> • <u>Ensure that rules do not breach s70 RMA and apply sound planning principals.</u> • <u>The following numerical limits/ targets for Nitrogen leaching are provided as an indication of the sort of LUC numbers that are intended to be applied. LUC numbers may be amended to be Sub-catchment specific in order to 1) maintain water quality where it currently meets the freshwater objectives or 2) improve water quality so that the freshwater objectives are achieved by 2030.....</u> <p><u>Include Farm environment management plans and good management practice standards as shown indicatively in appendix 10 to this submission.</u></p> <p><u>Apply the allocation principals from Beef and Lamb as set out in appendix 11 to this submission</u></p> | | |
| Beef + Lamb New Zealand Ltd Victoria Lamb Senior Environmental Policy Advisor PO Box 121 Wellington | S311 | Support in part | <p>Insert New Policy</p> <p>Nutrient Allocation Framework <u>The following principles should apply across the catchment in the determination of nutrient allocation allowances.</u></p> <p><u>Principal 1 Like land should be treated the same.</u></p> | FANZ supports the intent of the principals and considers that they could aid the development of provisions under the Whaitua Committees as well as implementation of the Plan. They provide a clear overarching direction for the Proposed NRP but FANZ | Accept the submission in part, reflecting FANZ's caution with natural capital allocation requiring wide stakeholder engagement. |

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| | | <p><u>Principle 2 Those undertaking activities that have caused water quality problems should be required to improve their management to meet water quality limits.</u></p> <p><u>Principle 3 Flexibility of land use must be maintained.</u></p> <p><u>Principle 4 The allocation system should be technically feasible, simple to operate and understandable.</u></p> <p><u>Principle 5 The natural capital of soils should be the primary consideration when establishing an allocation mechanism for nutrient loss.</u></p> <p><u>Principle 6 Allocation approaches should provide for adaptive management and new farm systems information.</u></p> <p><u>Principle 7 Appropriate time frames must be set to allow for transition from current state to one where allocation of nutrients applies.</u></p> <p><u>Principle 8 Long term investment certainty is a critical feature of a viable nutrient management system.</u></p> <p><u>Principle 9 Improvement in water quality must remain the primary objective of adopting any nutrient allocation regime.</u></p> <p><u>Principle 10 In under-allocated catchments, where property based nutrient allocation has not been adopted in setting water quality limits, the system for allocating nutrients must be</u></p> | <p>again expresses caution over the use of the natural capital based allocation approach which will require wide stakeholder engagement.</p> | |
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| | | | <p><u>determined well before the limit is reached, be clear and easy to understand and designed to avoid over-allocation.</u></p> <p><u>Principle 11 In designing the allocation system the benefits of a nutrient transfer system within the catchment or water management unit must be considered.</u></p> <p><u>Principle 12 Regulation, monitoring, auditing and reporting of nutrients within an allocation regime needs to relate to the degree of environmental impact and pressure.</u></p> <p><u>Principle 13 As a minimum expectation, in all catchments, all land users should be at or moving towards (industry defined) Good Management Practice (GMP) recognising that GMP is constantly evolving and continuous improvement is inherent in GMP.</u></p> <p><u>Principle 14 Nutrient allocation must be informed by sound science and stable and reliable catchment and farm system modelling and measurement.</u></p> <p><u>Note: These principles and the narrative behind them are appended.</u></p> | | |
| Dairy NZ and Fonterra Co-Operative Group Limited Oliver Parsons PO Box 10002 Wellington 6143 | S316 | Support | <p>Policy P71 Quality of discharges</p> <p>Insert a new policy to guide Whaitua Committees in the development of nutrient management provisions for their respective Whaitua for both point source and non-point source discharges.</p> <p>Amend Method M27 as follows:</p> | FANZ supports this submission as it seeks to aide implementation of the Plan. | Accept the submission in full. |

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| | | | <p>“Wellington Regional Council will develop <u>a framework to assist Whaitua Committees and implement a programme</u> to improve water quality for contact recreation and Māori customary use in the first priority fresh and coastal water bodies identified in Schedule H1.</p> | | |
| <p>Federated Farmers Elizabeth McGruddy PO Box 715 Wellington 6140</p> | <p>S352</p> | <p>Support in part</p> | <p>Add a new Policy - primary production as follows:</p> <p><u>The benefits of primary production, manufacturing, distribution and processing are recognised and provided for by:</u></p> <p><u>(a) Recognising existing land uses and investments, including capital and operational investments in sustainable farming practices and environmental stewardship</u></p> <p><u>(b) Supporting the ongoing use and development of land, recognising the need for flexibility to respond to seasonal fluctuations and changing markets</u></p> <p><u>(c) Providing for any requirements for significant new capital investments to be made only in the context of robust cost-benefit analysis</u></p> <p><u>(d) Providing transition times to meet new requirements or catchment limits</u></p> <p><u>(e) Working alongside industry and landowner/catchment groups to support the ongoing development of sustainable farming systems, and to enable collective or cross-catchment solutions to meet objectives</u></p> | <p>FANZ supports the intent of the submission to provide for the benefits of primary production.</p> | <p>Accept the submission in part: clauses (a), (b), (e) and (d) in so far as it provides for transition times. FANZ does not support or oppose clause (c).</p> |
| | | <p>Support in part</p> | <p>Add a new Policy - Land and Water Management Framework as follows:</p> | <p>FANZ supports the collaborative intent of the policy in reducing lowland nitrogen leaching losses to</p> | <p>Accept those parts of the submission that are of particular relevance to FANZ:</p> |

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| | | | <p><u>WRC will work with territorial authorities and industry to address priorities identified in the pNRP and Whaitua Implementation Plans, including:</u></p> <p>a) <u>prioritise catchments for coordinated community action</u> - including indicative priorities in M8, M9 and M12.</p> <p>b) <u>prioritise key pressures and sources, including</u> - <u>supporting industry/landowner initiatives to reduce hill country erosion and sediment losses, particularly during high-flow events.</u> - <u>supporting industry/landowner initiatives to reduce lowland nitrogen leaching losses to groundwater.</u> - <u>supporting territorial authority initiatives to reduce phosphorous discharges to surface water, particularly during summer low-flows.</u></p> <p>c) <u>prioritise effective and cost-effective management interventions</u> - <u>informed by expanded research and monitoring, including through M2 and M10.</u></p> | <p>groundwater and phosphorus flows to surface water.</p> | <p>being clause b) points 2 and 3.</p> |
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