

12 March 2024

Dear Greater Wellington Regional Council,

I am writing in support of the submission made by Civil Contractors New Zealand on your proposed Natural Resources Proposed Plan Change 1.

I request that you consider the feedback made in the submission, and the impact proposed changes may have on the local civil construction industry, and the region's ability to carry out infrastructure projects. Specifically, and with priority I request that you:

- Do not proceed with your proposal to implement different definitions of earthworks in different part of the region. This will only result in added cost and confusion. Please retain the existing definition of earthworks.
- Delete policy WH. P30: Discharge standard for earthworks. The proposed test methodology is not fit for purpose, and this should instead be handled in consent conditions depending on the nature of the site where the earthworks are taking place.

If the policy is to remain, the test methodology should be handled in guidance depending on the site and its surroundings, not as a blanket rule in the Natural Resources Plan itself.

- Delete policy WH. R23, which is written in a way that may require resource consent for basic works and emergency maintenance of transport and water networks, and in turn may overload council consenting capacity. If you do not delete this, please remove the reference to a hard shutdown of earthworks over winter and allow appropriate exceptions to this.
- Delete policy P.R24 (which treats earthworks as a non-complying activity and should instead treat it as a restricted discretionary activity).
- Delete policy WH. P31 and P.P29, which dictate hard shutdowns of earthworks sites for four months of the year. This policy will be disastrous for the regional industry, as it will prevent companies from retain earthmoving staff over those months. In turn, this will greatly escalate project cost and the ability for projects to proceed across the region. And if it is applied to sites that are already well-managed, it will create cost and disruption while adding no value. This approach must be reconsidered.
- Consider in P.R31, P.R32, P.R33 water usage for emergency works and essential environmental controls – i.e., dust control.

I also support the rest of the points made in the Civil Contractors New Zealand submission and ask you to consider the impacts this plan change will have on horizontal construction across the region, which will increase costs across the board, including housing, transport and water construction.

Overall, I feel direct consultation with the civil construction industry has been absent in the creation of this plan and is required to make sure the Natural Resources Plan is fit for purpose. Accordingly, I request the plan change does not go ahead.

If you have any further questions, please don't hesitate to contact me direct.

Yours faithfully



Jim Ginty

Managing Director

Multi Civil Contractors Ltd.



E jim@multicivil.co.nz