

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

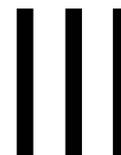
Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

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

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

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	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

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

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	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

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	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

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	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

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	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 gradation 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

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	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

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	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

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

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

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>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

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

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

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>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

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