

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.



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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

		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 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.

		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.

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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