

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](http://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](mailto: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

Anna Carter

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

Land matters Ltd

ADDRESS FOR SERVICE (INCLUDING POSTCODE)

20 Addington Road, Otaki, 5581

PHONE

06 364 7293

FAX

EMAIL

anna@landmattersnz.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.

We are a planning consultancy and for this reason we have an interest in the PNRP that is greater than the interest the general public has.

### 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.

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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.

<b>Details of the submission you are commenting on</b>  Name of person/ group making original submission and postal address.	<b>Original submission number</b>  The original submission number can be found on the submitter address list.	<b>Position</b>  Whether you support or oppose the submission.	<b>Part(s) of the submission you support or oppose</b>  Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions.	<b>Reasons</b>  Why you support or oppose each submission point.	<b>Relief sought</b>  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...
Department of Conservation	S75	Definitions: Amend Category 1 surface water bodies and wetland definitions  Amend Category 2 surface water to include F1 rivers	Oppose	DoC is seeking to increase Category 1 wetlands to those less than 0.1ha. There are significant restrictions on Category 1 waterbodies  Oppose inclusion of F1 Rivers as Category 2 surface waterbodies particularly where they are in hill country	Retain existing and amend definition of “natural wetlands” to exclude “pastures containing predominantly one wetland species having no other wetland indicator...”  Oppose inclusion of F1 Rivers as Category 2 surface waterbodies
Department of Conservation	S75	O5 – Support supporting safeguarding aquatic ecosystem health and mahinga kai	Oppose in part	Oppose the inclusion of mahinga kai where it does not reflect the wording of the NPS – FW	Amend all references to mahinga kai so that they reflect the definitions in the NPS - FW
Department of Conservation	S75	O10 – include margins of wetlands	Oppose	Inclusion of undefined (unmapped) margins and buffers without due consideration of each of the values within those specific areas creates significance uncertainty.	Delete any references to margins.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Department of Conservation	S75	O19 – Support retaining	Oppose	In some circumstances use and development should take priority so long as potential adverse effects (where those effects are more than minor) on natural processes can be avoided, remedied or mitigated. This objective is potentially ultra vires and its intention is already covered by O3, O4 and O5	Delete O19
Department of Conservation	S75	O22 – Support using hard engineering as last resort	Oppose	DoC submission is that this objective is consistent with the NZCPS – however this objective extends beyond the Coastal Environment which is not covered by the NZCPS.	Reword as follows, “soft engineering mitigation and protection methods are preferred and where practicable in areas of high natural character and/or coastal environment.”
Department of Conservation	S75	O23 – supports retaining “maintaining or improved”	Oppose	The requirement to improve water quality in all areas is not a compulsory requirement of the NPS – FW	Delete “or improved” and introduce it on a catchment by catchment basis through the Whaitua process
Department of Conservation	S75	O25 – DoC seeks review of the term of the term “balanced “ and also seeks review of narrative objectives	Support in part	The use of numerical objectives provide greater certainty and clarity.	Oppose the inclusion of non-compulsory values
Department of Conservation	S75	O27 – DoC supports vegetated riparian margins	Support in part	Oppose the requirement that all riparian margins are established and maintained	Amend O27 to read, “the benefits of riparian margins are promoted and landowners are supported to establish and maintain vegetated riparians margins where practicable.”
Department of Conservation	S75	O28 – DoC seeks that “values” instead of “condition” of natural wetlands are restored	Support in part	We support DoC’s submission to restore values but refer you to Land Matters submission on when “restoration” should be applied outside the Coastal Environment – as restoration is not a compulsory outside the coastal environment under the NPS – FW	Propose wording “the extent of natural wetlands is maintained and where possible, their values increased over time.”
Department of Conservation	S75	O29	Support in part	As above	Amend “... For the passage of fish and koura and over time the passage of indigenous fish and koura is restored ...”
Department of Conservation	S75	O31	Support	As above	As above

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Department of Conservation	S75	O35	Support in part	As above	Reword, "ecosystems and their habitats with significant indigenous biodiversity values are protected from inappropriate use and development and where possible restored.."
Department of Conservation	S75	O46 – O51	Support	Support	As per DoC's submission
Department of Conservation	S75	P3 – Support the precautionary principal	Support in part	Introduce and acknowledge level of risk is a relevant factor to take into account when applying this principal	Reword, ".... Regarding the receiving environment and the risk of adverse effects may have on the environment are high..."
Department of Conservation	S75	P24 – Outstanding Natural Character	Support in part	Oppose in part P24(e) where it references areas outside the Outstanding Natural Landscapes – where boundaries are set. The boundaries of these areas need to be mapped to provide certainty to landowners	Delete the following with P24(e) "avoiding adverse effects of activities, <del>including those located outside the Outstanding Natural Areas</del> that individually or cumulatively ..."
Department of Conservation	S75	P26 – Support Natural Process	Oppose in part	This is already covered by P4. The effects could be positive and the policy should refer to "adverse " effects	Amend to include, "use and development will be managed to minimise adverse effects on the ..."
Department of Conservation	S75	P31 Support	Oppose in part	Oppose the use of the word "minimise"	Replace word with "limit"
Department of Conservation	S75	P35 - Support	Oppose in part	Oppose Use of word "restore	Add after word, "restore <u>over time</u> " so it reads "provide for and restore over time and where practicable .."
Department of Conservation	S75	P40 - Support	Oppose in part	"protect and restore" assumes there can be no use of that resource	Amend and reword add after the words the following (or similar), ".... Avoid these ecosystems and habitats where there are other alternative solutions"
Department of Conservation	S75	P41 Support	Oppose	All activities should be considered on their merits taking into account any other alternatives. Retain P41(d). Delete References to "avoiding, remedied or mitigated or redressed through biodiversity off-setting"	Retain original wording of P41

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Department of Conservation	S75	P42 – Support	Oppose	The proposal to require ecological connectivity can not be justified. The areas connecting ecological sites can reduce landowners useable areas significantly. Furthermore additional land taken as buffers around ecological sites where those buffers are not first identified on maps in the plan making process result in significant uncertainty to landowners.	Delete P42(b) and P42(c).
Department of Conservation	S75	P43 Support	Oppose	For the reasons given above	Delete P43
Department of Conservation	S75	P48 – Support protectio of Outstanding Natural features and landscapes	Oppose in part	This policy should reference ‘significant’ adverse effects. Oppose the use of the word “avoiding” in P48(b) there is no basis for this provision. Support DoC’s amended wording	Amend by including the underlined wordes as follows: P48(a) “Avoiding <u>significant</u> adverse effects ...” P48(b) “ <del>Oppose</del> <u>Limit</u> significant adverse effects ...”

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