Proposed Natural Resources Plan:

Submitter:

Jenny Clark

Submitter Number:

S106

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region

This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

greater WELLINGTON
REGIONAL COUNCIL
Te Pane Matua Taiao

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

Or email: regionalplan@gw.govt.nz

Your details

Full name: Jenny Clark

Organisation name:
(If applicable)

Address for Service:

6 The Parade, Paekakariki 5034

Telephone no's: Work: Home: Cell:

Contact person: 0223844012

Address and telephone no (if different from above):

Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We will send you updates on the process, information and provide you with details of any meetings and the hearing. Please tick here ☐ if you do not agree to receive communication via email.

Email address: ijclark@xtra.co.nz

Trade competition

☒ I/we **could not** gain an advantage in trade competition through this submission. [Go straight to **Your Submission**]

☐ I/we **could** gain an advantage in trade competition through this submission.
If you **could** gain an advantage please complete one of the following:

- ☐ I/we **are** directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.
- ☐ I/we **are not** directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Your submission

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: →	☐ I **support** the provision ☐ I **oppose** the provision ☐ I wish to have the specific provision **amended**
	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	Sorry, can't see where I can simply support the CRU submission, so you get it all here! September 2015 Jenny Clark supports the Coastal Ratepayers United (CRU) submission set

		out below. The specific provisions of the Proposed Natural Resources Plan (PNRP) that this submission relates to The whole PNRP. Submission on the provisions Oppose and seek amendment. Reasons for the submission The whole PNRP, including the objectives, policies, rules, methods, schedules, maps and definitions, does not appropriately address and enable coastal hazard mitigation (including protection) measures including, in particular, for areas of significant existing development. This applies both in the coastal marine area and in other areas, including beds of rivers and streams. Appropriate coastal hazard mitigation (including protection) activities should be provided for as permitted or controlled activities. Coastal hazard mitigation (including protection) activities should, at worst, be discretionary activities and, where resource consent is required, there should be provisions in the objectives and policies that would support consent being obtained, not provisions that would hinder consent being obtained. The PNRP should clarify that, in contrast to risk management, hazard identification/risk assessment is an objective process and that any scientific or expert reports should be scientific and objective (not policy-based or precautionary) and report not only likely estimates but also their uncertainties, to enable submitters to participate in an informed way and to enable decision-makers to make informed decisions. This is important to avoid the coastal hazard risk assessment and risk management problems that have occurred in Kapiti and that are occurring elsewhere in New Zealand. The PNRP is not in accordance with the Resource Management Act 1991, including s 32, and sound resource management practice. The PNRP fails to give effect to the New Zealand Coastal Policy Statement 2010 and the Regional Policy Statement for the Wellington region. Adequate and appropriate s 32 RMA evaluations and reports have not been undertaken or regarded. The reasons in the submission of Coastal Ratepayers United Inc. are supported and adopted. Decision sought: Revise the whole PNRP, including the objectives, policies, rules, methods, schedules, maps and definitions, to appropriately address and enable coastal hazard mitigation (including protection) activities in the coastal marine area and other areas (including beds of rivers and streams), including especially for areas of significant existing development. When making the revisions, pay particular attention to enabling coastal hazard mitigation (including protection) activities in areas of significant existing development. Include objectives and policies that recognise the importance and benefits of coastal hazard mitigation (including protection) activities, especially in areas of significant existing development. Include objectives and policies that, if a resource consent is required, support that consent being obtained, not provisions that would hinder consent being obtained. Provide for appropriate coastal hazard mitigation (including protection) activities to be permitted or controlled activities.

		Provide for coastal hazard mitigation (including protection) activities to be, at worst, discretionary activities and ensure that none of them is (or could become due to other rules) a non-complying or prohibited activity. Revise the PNRP to clarify that, in contrast to risk management, hazard identification/risk assessment is an objective process and that any scientific or expert reports are to be scientific and objective (not policy-based or precautionary) and report not only likely estimates but also their uncertainties, to enable submitters to participate in an informed way and to enable decision-makers to make informed decisions. Ensure that the provisions of the PNRP comply with the Resource Management Act 1991, including that they give effect to the New Zealand Coastal Policy Statement 2010 and the Regional Policy Statement for the Wellington region. Undertake appropriate s 32 evaluations and prepare revised s 32 reports, having proper regard to s 32 matters, including in relation to the implications of the PNRP for coastal hazard mitigation (including protection) activities. Have regard to those revised reports. The decisions sought in the submission of Coastal Ratepayers United Inc. are supported and adopted in this submission.

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: ➔	☐ I **support** the provision ☐ I **oppose** the provision ☐ I wish to have the specific provision **amended**
	Reasons for my submission: ➔	
	I seek the following decision from WRC (give precise details): ➔	

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The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: ➔	☐ I **support** the provision ☐ I **oppose** the provision ☐ I wish to have the specific provision **amended**
	Reasons for my submission: ➔	
	I seek the following decision from WRC (give precise details): ➔	

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	Reasons for my submission: ➔	
	I seek the following decision from WRC (give precise details): ➔	

If you have more submissions you wish to make, please find more boxes at the bottom of this document

Attendance and wish to be heard at hearing(s)

☐ I/We do wish to be heard in support of my/our submission
[Note: This means that you wish to speak in support of your submission at the hearing(s).]

☐ I/We do not wish to be heard in support of my/our submission
[Note: This means that you cannot speak at the hearing. However, you will still retain your right to appeal any decision made by the Wellington Regional Council to the Environment Court.]

☐ If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature: _____ Date: _____

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: ➔	☐ I **support** the provision ☐ I **oppose** the provision ☐ I wish to have the specific provision **amended**
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	I seek the following decision from WRC (give precise details): ➔	

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	Reasons for my submission: ➔	
	I seek the following decision from WRC (give precise details): ➔	

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	Reasons for my submission: ➔	
	I seek the following decision from WRC (give precise details): ➔	

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	Reasons for my submission: ➔	
	I seek the following decision from WRC (give precise details): ➔	

September 2015

Jenny Clark supports the Coastal Ratepayers United (CRU) submission set out below.

The specific provisions of the Proposed Natural Resources Plan (PNRP) that this submission relates to

The whole PNRP.

Submission on the provisions

Oppose and seek amendment.

Reasons for the submission

The whole PNRP, including the objectives, policies, rules, methods, schedules, maps and definitions, does not appropriately address and enable coastal hazard mitigation (including protection) measures including, in particular, for areas of significant existing development.

This applies both in the coastal marine area and in other areas, including beds of rivers and streams.

Appropriate coastal hazard mitigation (including protection) activities should be provided for as permitted or controlled activities.

Coastal hazard mitigation (including protection) activities should, at worst, be discretionary activities and, where resource consent is required, there should be provisions in the objectives and policies that would support consent being obtained, not provisions that would hinder consent being obtained.

The PNRP should clarify that, in contrast to risk management, hazard identification/risk assessment is an objective process and that any scientific or expert reports should be scientific and objective (not policy-based or precautionary) and report not only likely estimates but also their uncertainties, to enable submitters to participate in an informed way and to enable decision-makers to make informed decisions. This is important to

avoid the coastal hazard risk assessment and risk management problems that have occurred in Kapiti and that are occurring elsewhere in New Zealand.

The PNRP is not in accordance with the Resource Management Act 1991, including s 32, and sound resource management practice. The PNRP fails to give effect to the New Zealand Coastal Policy Statement 2010 and the Regional Policy Statement for the Wellington region.

Adequate and appropriate s 32 RMA evaluations and reports have not been undertaken or regarded.

The reasons in the submission of Coastal Ratepayers United Inc. are supported and adopted.

Decision sought:

Revise the whole PNRP, including the objectives, policies, rules, methods, schedules, maps and definitions, to appropriately address and enable coastal hazard mitigation (including protection) activities in the coastal marine area and other areas (including beds of rivers and streams), including especially for areas of significant existing development.

When making the revisions, pay particular attention to enabling coastal hazard mitigation (including protection) activities in areas of significant existing development.

Include objectives and policies that recognise the importance and benefits of coastal hazard mitigation (including protection) activities, especially in areas of significant existing development.

Include objectives and policies that, if a resource consent is required, support that consent being obtained, not provisions that would hinder consent being obtained.

Provide for appropriate coastal hazard mitigation (including protection) activities to be permitted or controlled activities.

Provide for coastal hazard mitigation (including protection) activities to be, at worst, discretionary activities and ensure that none of them is (or could become due to other rules) a non-complying or prohibited activity.

Revise the PNRP to clarify that, in contrast to risk management, hazard identification/risk assessment is an objective process and that any scientific or expert reports are to be scientific and objective (not policy-based or

precautionary) and report not only likely estimates but also their uncertainties, to enable submitters to participate in an informed way and to enable decision-makers to make informed decisions.

Ensure that the provisions of the PNRP comply with the Resource Management Act 1991, including that they give effect to the New Zealand Coastal Policy Statement 2010 and the Regional Policy Statement for the Wellington region.

Undertake appropriate s 32 evaluations and prepare revised s 32 reports, having proper regard to s 32 matters, including in relation to the implications of the PNRP for coastal hazard mitigation (including protection) activities. Have regard to those revised reports.

The decisions sought in the submission of Coastal Ratepayers United Inc. are supported and adopted in this submission.