

Proposed Natural Resources Plan:

Submitter:

GBC Winstone

Submitter Number:

S66

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



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

Or email: regionalplan@gw.govt.nz

Your details

Full name: GBC Winstone (Attn: Ian Wallace)

Organisation name:
(If applicable) P O Box 17 195, Greenlane, Auckland 1546

Address for Service: 26 Patrick Street, Petone, Lower Hutt 5012, c/o Allan Planning and Research Ltd

Telephone no's: Work: Home: Cell: 021 665 155

Contact person:

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:

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

In late 2014, Golden Bay Cement and Winstone Aggregates integrated to become GBC Winstone, New Zealand's largest supplier of cement and aggregates. GBC Winstone remains a business unit of Fletcher Concrete and Infrastructure Limited. The merger of GBC Winstone brings together New Zealand's largest cement manufacturer with New Zealand's largest manufacturer and distributor of aggregates and sand to roading, ready mixed concrete, concrete product manufacturers and to building, construction and civil engineering customers. It also runs cleanfill operations.

Within the Wellington Region, GBC Winstone has operations at Belmont, Dry Creek (Haywards), Otaki, Petone, Waikanae and Wainuiomata, as well as a significant bulk cement storage and distribution centre at Aotea Quay, Wellington Port.

Such activities provide essential supplies and services for the economic growth and wellbeing of the Region's communities.

The point-by-point submissions below largely seek to address the complete policy gap in the documentation relating to aggregate supplies and the activity of cleanfilling, both of which will require numerous regional consents (reconsenting and additional consents) for existing and future activities to meet the region's needs. For a range of reasons, many of these activities appear to have become non-complying activities in the Proposed Natural Resources Plan (the Proposed Plan). In the absence of policy recognition of the fundamental importance of such activities to communities for their social and economic wellbeing, it will be difficult for providers to meet the region's needs for such resources at reasonable cost, with flow-on effects into the sustainable management of the Region's physical resources.

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

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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): Section 2.2 – Definitions Definition of "Cleanfill material" | My submission on this provision is: ➔ | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: ➔ | The definition is too limiting in that: a) it does not allow for small components of organic material that may be found in soils or clay and which cannot be separated out b) it does not provide for wet materials that are excavated by means of wet excavation (hydro materials) and therefore contain waste liquids. |
| | I seek the following decision from WRC (give precise details): ➔ | Modify the definition so that it: a) provides for a small proportion of organic material (say 2% by truckload) in soils and clays and material that is otherwise cleanfill b) clearly excludes wet wastes such as hydro excavated material from item (e) in the definition. |

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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): Section 2.2 – Definitions Definition of "Bore" | My submission on this provision is: ➔ | <input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: ➔ | The definition has corrected the anomaly in the operative plan in that the definition of bore no longer captures quarrying activities. |
| | I seek the following decision from WRC (give precise details): ➔ | |

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

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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): Section 2.2 – Definitions Definition of "Natural process" | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | This inclusion of "ecological" relationships is confusing and inappropriate in this definition, particularly given how the term is used in policy elsewhere in the Proposed Plan. This could become the basis for protection of vegetation inadvertently. |
| | I seek the following decision from WRC (give precise details): → | Reword to read "Dynamic natural <u>and</u> physical and ecological relationships; actions and events that are characteristically natural that act to shape" |

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

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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): Section 2.2 – Definitions Definition of "Regionally significant infrastructure" | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | There are a number of policy areas in the Proposed Plan which would assist with the establishment, operation, maintenance and replacement of the items listed. Quarry activities, particularly hard rock quarries, will face extreme policy difficulties unless specific policy recognition is provided for them. A modification to the definition is one way of achieving the policy recognition which is the basis for GBC Winstone's submission. The comment equally applies to the region's major landfills and cleanfill facilities. |
| | I seek the following decision from WRC (give precise details): → | <ul style="list-style-type: none"> • Add either a generic bullet-point which refers to quarries which serve regional or sub-regional areas, or specifically list the hard rock quarries which serve the region's main urban areas. • Add either a generic bullet-point which refers to landfills and cleanfills which serve regional or sub-regional areas, or specifically list these facilities. |

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

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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): Section 2.2 – Definitions Definition of "Whaitua" | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | The definition includes mention of "designated area". This term has a specific meaning under the RMA and the definition is therefore confusing. |
| | I seek the following decision from WRC (give precise details): → | Replace the term "designated area" with "specified". |

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

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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): Objectives under Section 3.2 Beneficial use and development | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | There is no objective which recognises or supports the development or provision of aggregate supplies or other key infrastructure which are social and economic necessities in the modern world (including cleanfills and sanitary landfills). Such provision is made at regional or sub-regional level and should be enabled for through an objective. The importance of these facilities is at least equivalent to some types of renewable energy generation facilities and some of the other items covered in regionally significant infrastructure within the region. |
| | I seek the following decision from WRC (give precise details): → | Either add a new objective which relates to RPS Objective 31, or add "major quarry and cleanfill sites" to the definition of regionally significant infrastructure, or develop an alternative means of recognising and providing for such facilities under this heading in a similar way to the provision made in Objectives O12 and O13. |

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

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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): Section 4.2 Policy P4 Minimising adverse effects | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | The term minimise is used extensively in the Proposed Plan. It is inconsistent with Section 5 RMA which requires activities to "avoid, remedy or mitigate". Item (a) and (c) in this policy are particularly opposed. Item (a) far exceeds the RMA's requirement to consider alternative locations or methods; item (e) may have unforeseen consequences by concentrating adverse effects; and the construction of the policy requires that all items, plus more, be considered. |
| | I seek the following decision from WRC (give precise details): → | Should the term remain in the Proposed Plan, remove items (a) and (e) and change all "ands" to "ors". To assist the interpretation of this policy, a definition of "Practicable" should be added, in Section 2 of the Proposed Plan. |

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

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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): Section 4.2 Policy P7 Beneficial use and development | My submission on this provision is: → | <input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | Item (g) is generally supported because it provides for part of the Region's aggregate needs. However, the use of land for other aggregate supplies (including hard rock quarrying and land-based gravel extraction) should be recognised, as should the use of land for cleanfills and landfills. At present the Proposed Plan does not give effect to the RPS in this respect. Similarly the RPS recognises the need to protect such resources for the future, so reverse sensitivity is a key consideration. |
| | I seek the following decision from WRC (give precise details): → | Retain item (g) but add a reference to sand and other materials. Provide new items to address the matters referred to above. Alternatively such provision could be made within the suite of policy provisions in Policy P12 to P14. |

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

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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): Policies P44 and P45 Sites with significant mana whenua values | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | These policies set out the basis for management of such places. Winstone Aggregates currently operates sand extraction activities which assist with flood management in one area identified in Schedule C4. These policies set a very high bar for the continuation of the existing activity. |
| | I seek the following decision from WRC (give precise details): → | Include policy recognition of established activities and any wider beneficial components of such activities. |

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

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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): Policy P102 Reclamation or drainage of the beds of lakes and rivers | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | This policy does not allow for the operation, development or management of large quarry activities or cleanfills where reclamation of tributaries may be necessary as a means of operating or managing the activity in a way that minimises the effects of the activity. The policy sets an unreasonably high bar for some activities that are necessary for the social and economic wellbeing of the community. |
| | I seek the following decision from WRC (give precise details): → | Add reference to quarry activities and major cleanfills in item (d) either by modifying the definition of "regionally significant infrastructure" or by specific mention, and delete items (f) and (g). |

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

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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): Policy P103 Management of gravel extraction | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | This policy is generally supported. However, the use of various terms can lead to confusion. The changes requested are intended to clarify this policy. |
| | I seek the following decision from WRC (give precise details): → | <ul style="list-style-type: none"> • Add "materials" after "gravel, sand or rock" in the introduction to the policy. • In (b) replace "sediment and gravel" with "material". • Reword (c) to state: "The rate of <u>gravel</u> extraction does not exceed the natural rate of <u>gravel</u> deposition, unless this is required to manage aggradation". |

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

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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): All policies that refer to Schedule F | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | The policies refer specifically to Schedule F, indicating specific lists of items. Schedule F however has a paragraph at the start that suggests (and in practice may provide) that any other place that meets the RPS criteria referred to may be included in Schedule F. This preamble is unnecessary and confusing in interpreting the various policies and adds uncertainty to the Plan. |
| | I seek the following decision from WRC (give precise details): → | Delete the first paragraph in Schedule F (see also later submission on this point). |

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

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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): Interpretation sections Rules 5.1 to 5.7 | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | <p>It is not clear that the rules marked coastal also apply in other parts of the region beyond the coastal marine areas in 5.1 to 5.6. This is in contrast to Section 2.1 where it is clear what the intention is. It is unlikely that people would always look at Section 2.1</p> <p>In 5.7, Coastal Management, it is not stated whether these rules apply in the CMA or the coastal environment. It does appear that the rules apply only in the coastal marine areas, although some of the conditions apply beyond this area. It would be much more efficient for this to be made clear at the start of the section then to be stated in every rule.</p> |
| | I seek the following decision from WRC (give precise details): → | <p>Modify all Interpretation sections in Rules 5.1 to 5.6 to incorporate a similar provision as in the last sentence in the second paragraph in Section 2.1.</p> <p>Clarify the extent of application of the rules in 5.7, Coastal Management.</p> |

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

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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): Rules R27 and R28 Air quality rules | My submission on this provision is: → | <input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | The rules provide for activities that are undertaken by the submitter and the permitted activity status is supported. |
| | I seek the following decision from WRC (give precise details): → | Retain these rules unchanged. |

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

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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): Rule R41 Air discharge default rule | My submission on this provision is: → | <input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | The default status of fully discretionary activities which do not meet standards or are not provided for in rules, is supported. |
| | I seek the following decision from WRC (give precise details): → | Retain the rule unchanged. |

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

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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): Rule R53 Stormwater discharge default rule | My submission on this provision is: → | <input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | The default status of fully discretionary for activities which do not meet standards or are not provided for in rules, is supported. |
| | I seek the following decision from WRC (give precise details): → | Retain the rule unchanged. |

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

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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): Rule R67 Discharges inside sites of significance | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | This rule needs to include a note to the effect that discharges associated with dredging for flood protection or erosion mitigation is provided for under Rules R200 and R201, otherwise this may be regarded as the more specific rule. |
| | I seek the following decision from WRC (give precise details): → | Add a note following Rule R67 to the effect set out above. |

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

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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): Rule R93 Discharges to land default rule | My submission on this provision is: → | <input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | The default status of fully discretionary for activities which do not meet standards or are not provided for in rules, is supported. |
| | I seek the following decision from WRC (give precise details): → | Retain the rule unchanged. |

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

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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): Rule R101 Default rule for earthworks and vegetation clearance | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | While GBC Winstone generally supports the discretionary default activity, the vegetation clearance rule requires a reference to erosion prone land in order to make sense of it. The parent rule, Rule 100, applies only in such circumstances, so the default rule should do the same. |
| | I seek the following decision from WRC (give precise details): → | Add reference to vegetation clearance on erosion prone land, rather than a general provision in this rule. |

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

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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): Rule R122 Vegetation removal in rivers and lakes | My submission on this provision is: → | <input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | This activity allows for minor vegetation clearance and management in rivers and tributaries. |
| | I seek the following decision from WRC (give precise details): → | Retain the rule unchanged. |

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

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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): Rule R127 Reclamation of beds of rivers | My submission on this provision is: → | <input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: → | This non-complying status of this activity, in the absence of any policy which would support quarry, cleanfill and landfill activities, will mean that consents, even high in catchment and modified areas would be very difficult (if not technically impossible) to achieve. |
| | I seek the following decision from WRC (give precise details): → | Delete (a) from Rule R127. This would allow for steam piping activities to be considered as discretionary activities under Rules R129 and R135 (accepting that diversion would be involved). |

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

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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): Rule R195 Disturbance or damage inside sites of significance | My submission on this provision is: ➔ | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: ➔ | The explanation needs to include a note to the effect that dredging for flood protection or erosion mitigation and associated disturbance and damage is covered in Rules R200 and R201. |
| | I seek the following decision from WRC (give precise details): ➔ | Add a note following Rule R195 to the effect set out above. |

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

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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): New rule sought | My submission on this provision is: ➔ | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: ➔ | At present it appears that riverbed gravel extraction for flood protection purposes would be a discretionary activity under Rule R129. However, the ancillary discharges may make the activity non-complying in many areas where such activities are undertaken under Rule R67. A new rule applying in the region's riverbeds which is similar to Rule R201 in intent (and which includes ancillary activities such as takes and discharges) should be included in Section 5.5. |
| | I seek the following decision from WRC (give precise details): ➔ | Add a new rule in Section 5.5 with the above purposes. |

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

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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): Schedule F Ecosystems and habitats with significant indigenous biodiversity values | My submission on this provision is: ➔ | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| | Reasons for my submission: ➔ | The first paragraph refers to RPS Policy 23, leaving open the interpretation that this is not a fully inclusive listing and that provisions which refer to this schedule could also be applied to items which are not listed on this schedule. I.e. any item which meets RPS Policy 23 would be incorporated under Schedule F whether it is listed or not. |
| | I seek the following decision from WRC (give precise details): ➔ | Delete the first paragraph under the heading of Schedule F. |

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

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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: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| Schedule G Principles to be applied when proposing and considering mitigation and offsetting in relation to biodiversity | Reasons for my submission: → | There is a fundamental problem in item 3 under this heading where mitigation or offset is required to "demonstrate that positive effects on biodiversity are additional to what would have occurred without [the action]". A similar situation exists in relation to item 4. Item 6 requires "no net loss" in an offset, which is not appropriate in all circumstances, and "preferably a net gain". These go well beyond the RMA and are therefore ultra vires the RMA, which is not a "no adverse effects" statute. |
| | I seek the following decision from WRC (give precise details): → | Delete items 3, 4(a) and 6 in Schedule G. |

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

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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: → | <input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended |
| General submission – Alternative relief | Reasons for my submission: → | The submission form has been designed in a way that is inflexible. |
| | I seek the following decision from WRC (give precise details): → | In relation to the above submissions, GBC Winstone recognises that there may be alternative relief and in appropriate circumstances seeks suitable alternative relief. |

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: _____

22/09/15

[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.