



PRITCHARD
GROUP LIMITED

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20 Addington Road, RD1 Otaki, New Zealand

8 June 2009

Greater Wellington Regional Council
P O Box 11-646
WELLINGTON 6142

By Fax Also: 04 385 6960 (3 Pages)

Attention: Chief Executive Officer

Proposed Regional Policy Statement - Submission

Dear Sir or Madam,

Please find enclosed a submission pursuant to Clause 6 of the First Schedule of the Resource Management Act on the proposed Regional Policy Statement.

Please contact me should you have any questions about the enclosed submission.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'B. Holmes', written in a cursive style.

Bryce Holmes
SENIOR PLANNER

Form 5

Submission on publicly notified proposal for policy statement or plan

Clause 6 of First Schedule, Resource Management Act 1991

Local authority:

Wellington Regional Council trading as Greater Wellington

Name of submitter:

Pritchard Group Limited

Name of proposed or existing plan:

This is a submission on the proposed Regional Policy Statement for the Wellington Region.

The specific provisions to which the submission relates:

This submission relates to all the provisions of the proposed Regional Policy Statement that are applicable to natural hazards, but more specifically proposed policy 28 and the explanation to the policy.

Our submission is:

Pritchard Group Ltd believes that it is important to manage the risk associated with natural hazards in the Region.

However, the policy as it currently drafted lacks balance in terms of the purpose and principles of the Act and is not 'effects' based which is a strong underpinning of the Act.

The submitter agrees with part a) of the direction under the policy that asks Territorial Authorities to identify natural hazards within their individual district plans. However part b) directs the same Territorial Authorities to avoid subdivision *and development* within those identified areas (note there is no definition of *development* in the RPS so the policy could encompass things like infrastructure etc).

The policy seems to direct prohibition of activities within those areas. Prohibition does not allow for innovative approaches to managing the effects of activities within areas of natural hazards, and therefore is not an effective or efficient policy.

The approach in policy 28 is not, in our opinion, consistent with the purpose of Act.

Decision sought:

The submitter requests that policy 28 (and all associated explanations and cross referenced provisions within the RPS) is deleted from the RPS, or alternatively re-worded to allow for a more managed and innovative approach.

Hearing:

The submitter does wish to be heard in support of our submission. If others make a similar submission we may reconsider and present a joint case with them at a hearing.



Signature of person authorised to sign
on behalf of the submitter

8/6/09
Date

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