

Proposed Natural Resources Plan:

Submitter:

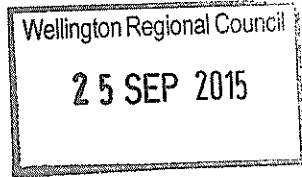
Cuttriss Consultants Limited

Submitter Number:

S104

To: Freepost 3156
 Wellington Regional Council
 PO Box 11846
 Wellington 6142

Or email: regionalplan@gw.govt.nz



Your details

Full name: _____

Organisation name:
 (If applicable) Cutriss Consultants Limited

Address for Service: PO Box 30429, Lower Hutt 5010

Telephone no's: Work: 04 939 9248 Home: _____ Cell: 027 246 4427

Contact person: Michelle Grinlinton-Hancock

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: michelle@cutriss.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): Rules 50 and 51	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 requirement to gain consent for all existing infrastructure is an onerous requirement. Although the intent behind the rule is understood in terms of achieving water quality data on stormwater discharges from local authority networks, this requirement will put unreasonable costs on local authorities and subsequently rate payers as local authorities source funding for this work.
	I seek the following decision from WRC (give precise details): →	That the provisions be deleted or alternatively amended so that: - point 3 of the matters of control is a condition rather than a matter of control - If Rules 50 and 51 are retained in the plan, then a Permitted Activity Rule be inserted which provides for the construction of new discharge pipes to be

		constructed in areas subject to a Stormwater Management Strategy.
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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): Rule 42	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 rule will provide for minor discharges of stormwater where the adverse effects will not be significant and will reduce the volume of consent applications that were being applied for, and granted on a regular basis.
	I seek the following decision from WRC (give precise details): ➔	That the rule be retained.

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): Rule R54	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: ➔	The rule references specific documents and will become outdated over the lifetime of the Plan, should these documents be amended and/or renamed.
	I seek the following decision from WRC (give precise details): ➔	That provisions (a) and (b) be amended to include any future iterations of these documents.

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): Rule R70	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 volume specified in (f) would require that the majority of development sites across Wellington would be required to obtain regional consent as well as local authority consent. Or alternatively would require regional consent even though they comply with the earthworks standards of the local authority plans. It is also noted that if the Permitted Activity standards cannot be met then the activity status defaults to Discretionary Unrestricted.
	I seek the following decision from WRC (give precise details): ➔	That the rule be amended so that: - (f) relates to a greater volume of material (i.e. 1000 cubic metres) - that the rule be amended to include an exemption that enables earthworks being undertaken in association with a subdivision, and/or earthworks associated with residential and building developments be exempt from the standards set under (f).

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): Rule R99	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: →	Where earthworks cannot meet the Permitted Activity standards, the activity status defaults to Discretionary Unrestricted. Where one or two of the standards cannot be met, a lesser activity status should be able to be applied.
	I seek the following decision from WRC (give precise details): →	Insert a rule allowing for activities that cannot meet one or two of the Permitted Activity standards to be considered as a Controlled or Restricted Discretionary Activity with control or discretion being retained over the standard(s) not met.

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): 5.5.4 General Provisions	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: →	These are supported as they are essentially best practice for minimising the adverse effects of an activity on a water way, and these were commonly included as conditions of consent. With these as standards, they do not need to be conditions on consents, which makes consent decisions more concise.
	I seek the following decision from WRC (give precise details): →	That the provision be retained.

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): Rule R112	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: →	Where upgrade and maintenance works cannot meet the Permitted Activity standards, the activity status defaults to Discretionary Unrestricted. Where one or more of the standards cannot be met, a lesser activity status should be able to be applied.
	I seek the following decision from WRC (give precise details): →	Insert a rule allowing for activities that cannot meet one or two of the Permitted Activity standards to be considered as a Controlled or Restricted Discretionary Activity with control or discretion being retained over the standard(s) not met.

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): Rule R129	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: →	It is not clear where erosion protection measures fit in terms of the rules associated with Wetlands and Rivers and it appears that other than repairs and maintenance to existing structures, all new structures would require consent under Rule R129.
	I seek the following decision from WRC (give precise details): →	Insert a rule providing for erosion protection measures, rather than have them default to a catchall Discretionary Unrestricted activity status.

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): Rule R140	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: →	In some parts of the Region, dewatering is a necessary and unavoidable part of construction works and for this reason a rule specifically related to dewatering is supported. However, the majority of construction projects would require dewatering for more than one month.
	I seek the following decision from WRC (give precise details): →	Amend the rule to insert the following - provision of dewatering for longer than a month, where the rate of take does not exceed a specified rate (may vary for regions); - provision of dewatering for longer than a month at an uncapped rate, in circumstances where the water will be returned to the same water source

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): Rule K.R1	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: →	Water take limits are supported in principal. In parts of the Region, dewatering is a necessary and sometimes unavoidable part of development works. It is considered that dewatering, where the water will not be permanently removed from the water cycle, or where it will be returned to the same water source, should be excluded from water allocation limits.
	I seek the following decision from WRC (give precise details): →	Amend the rule to exclude dewatering from being subject to the water allocation rules, where: - the dewatering water will not be permanently removed from the water cycle. - the dewatering water will be returned to the same water source.

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

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	Reasons for my submission: →	
	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:

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 type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	
	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:

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 type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	
	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:

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 type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	
	I seek the following decision from WRC (give precise details): →	

