



**Forest & Bird**  
GIVING NATURE A VOICE

**RESOURCE MANAGEMENT ACT 1991  
SUBMISSION ON WELLINGTON PROPOSED NATURAL RESOURCES PLAN**

To: Greater Wellington Regional Council

From: Royal Forest and Bird Protection Society of New Zealand Inc (Forest & Bird)

**Address for service:**

Forest and Bird  
P O Box 631  
Wellington 6140  
Attention: Amelia Geary

This is a further submission in support of, or in opposition to, submissions on the Proposed Natural Resources Plan for the Greater Wellington Region, pursuant to Clause 8 of Schedule 1 of the Resource Management Act 1991.

Forest and Bird represents relevant aspects of the public interest. Forest and Bird is New Zealand largest and oldest conservation organisation and represents more than 70,000 members and supporters who have an interest in the sustainable management and protection of New Zealand's indigenous biodiversity, natural landscapes, recreational access and enjoyment to the coastal marine area, and to publicly owned land, and rivers and lakes.

We could not gain an advantage in trade competition through this submission.

Forest and Bird wishes to be heard in support of our submission.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
Minister of Conservation RMA Shared Services Department of Conservation Private Bag 3072 Hamilton 3240 Attn.: Rachel Penney	S75	Support	We support the entire submission except where points are in conflict with Forest & Bird's original submission, in which case our submission takes precedence.	The submission is generally in alignment with all relevant legislation and policy documents.	Allow entire submission where not in direct conflict with Forest & Bird's original submission.
Ian Benge and Martin Benge 6 Holmwood Road Merivale Christchurch 8014	S83	Oppose	Submission Point 1	P102(c) This policy is inappropriate given the potential implications for Taupō Swamp from large scale catchment modification with suburban development associated with the northern growth area. R127 This rule is inappropriate. The damming or reclamation of outstanding water bodies should be prohibited.	Disallow whole submission point.
	S83	Oppose	Submission Point 2	It is highly inappropriate to exclude streams that are located within the Plimmerton Farm site from Schedule F1.	Disallow whole submission point.
Environmental Defence Society Incorporated P.O. Box 91736 Victoria Street West Auckland 1042 Attn: Madeleine Wright	S110	Support	General submissions 1-3	Regional plans must give effect to the New Zealand Coastal Policy Statement 2010 and the National Policy Statement Freshwater Management 2014.	Allow all three submission points.
	S110	Support	Section 2.2 definition of "Biodiversity offsets"	The definition aligns with international best practise.	Allow submission point.
Wairarapa Regional Irrigation Trust 316 Queen Street P.O. Box 920 Masterton 5840 Attn: Geoff Copps	S127	Oppose	We oppose the proposed addition of a new policy in Section 4.9 (Policies P107 to p127) Water Allocation policies and the new Definition proposed for Section 2.2.	These proposed additions are inconsistent with the purposes of the RMA.	Disallow whole submission point.
Kiwi Rail Holdings Limited P.O. Box 593 Wellington 6140 Attn: Rebecca Beals	S140	Oppose	We oppose the inclusion of the wording "where values have been compromised" regarding Objectives O33 and O35.	This wording adds subjectivity and does not add clarity to the plan.	Disallow submission points 22 and 23.
		Oppose	We oppose the amendment to Rule 127.	This amendment is incompatible with the RMA.	Disallow submission point 61.
NZ Transport Agency P.O. Box 5084 Lambton Quay Wellington 6145 Attn: Caroline Horrox	S146	Support	We support the inclusion of a definition of marine coastal area in section 2.2 Definitions in accordance with s2 of the RMA.	This is an appropriate definition in a regional plan.	Support submission point to include a definition of marine coastal area.
		Oppose	We opposed the additional wording "to	This wording does not add clarity to the	Disallow the additional wording proposed in

			the extent practicable” in Policy 73, 78, 89, 97.	plan.	said policies.
		Oppose	We oppose the proposed rewording of Policy P102: Reclamation or drainage of the beds of lakes and rivers.	This policy is inappropriate. Insofar as this further submission is inconsistent with our original submission, this further submission takes priority.	Disallow whole submission point.
		Oppose	We oppose the inclusion of reclamation as a discretionary activity in regard to Rule R107 activities in natural wetlands and significant natural wetlands.	Reclamation is inconsistent with s6 of the RMA and this clause hasn't been properly considered with regard to the provisions of the NZCPS.	Disallow whole submission point.
Queen Elizabeth II National Trust P.O. Box 3341 Level 4 138 The Terrace Wellington 6140	S157	Support	We support QEII National Trust's request to have the status of Taupō Swamp Complex elevated from Significant to Outstanding.	The Wildlands report attached to QEII National Trust's submission provides adequate evidence that Taupō Swamp is an Outstanding Wetland.	Include Taupō Swamp Complex in Schedule A3.
Porirua City Council P.O. Box 50-218 16 Cobham Court Porirua 5240 Attn: Harriet Shelton	S163	Oppose	Policy P102: Reclamation or drainage of the beds of lakes and rivers.	This policy is inappropriate given the potential implications for Taupō Swamp from large scale catchment modification with suburban development associated with the northern growth area. Insofar as this further submission is inconsistent with our original submission, this further submission takes priority.	Disallow whole submission point.
Irrigation New Zealand Incorporated P.O. Box 69119 Lincoln Christchurch 7640	S306	Oppose	We oppose this submission in its entirety.	The proposed submission is inconsistent with the purposes of the RMA.	Disallow whole submission.
Fish and Game P.O. Box 1325 Palmerston North 4440	S308	Support	We support the entire submission except where points are in conflict with Forest & Bird's original submission, in which case our submission takes precedence.	The submission is generally in alignment with all relevant legislation and policy documents.	Allow entire submission where not in direct conflict with Forest & Bird's original submission.
Dairy NZ and Fonterra Co-operative Group Ltd P.O. Box 10002 Wellington 6143 Attn: Oliver Parsons	S316	Oppose	We oppose this submission in its entirety.	The proposed submission is inconsistent with the purposes of the RMA.	Disallow whole submission.
Federated Farmers of New Zealand P.O. Box 715 Wellington 6140 Attn: Elizabeth McGruddy	S352	Oppose	We oppose the additional wording in the definition of vegetation clearance pg 27.	We consider the words “regenerating scrub” to be subjective.	Disallow the additional wording “For the purposes of rule R100...” and/or include a further definition for ‘Regenerating scrub’.
		Oppose	We oppose the proposed amendment to O44 to manage land use activities through a non-regulatory programme.	We consider this to be highly inappropriate and inconsistent with s6(c) of the RMA.	Disallow whole submission point pertaining to O44.
		Oppose	We oppose the proposed amendment to	This inconsistent with the RMA,	Disallow whole submission point pertaining

			O45.	including Part 2 and section 30.	to O45.
		Oppose	We oppose the proposed amendments to O52.	Water storage should not be enabled regardless of environmental impact, instead sustainable land use practices that don't rely on water storage must be investigated and promoted.	Disallow whole submission point pertaining to O52.
		Oppose	We oppose the proposed amendments to P4.	This policy should be deleted as it does not meet the requirements of the RMA	Disallow whole submission point pertaining to P4.
		Oppose	We oppose the new policies for 'Primary production' and 'Irrigation'	We do not consider these to be beneficial use or development.	Disallow proposed new policies for 'Primary production' and 'Irrigation'
		Oppose	We oppose the proposed amendments to R83.	These amendments do not meet the purposes of the RMA.	Disallow whole submission point pertaining to R83.
		Oppose	We oppose the proposed amendments to R94.	The proposed amendments make the Rule incompatible with the RMA.	Disallow whole submission point pertaining to R94.
		Oppose	We oppose the proposed amendments to R108.	The proposed activities on natural and significant natural wetlands should be non-complying activities.	Disallow whole submission point pertaining to R108.
		Oppose	We oppose the proposed deletion of R109, R110, R111.	These rules should be amended, not deleted.	Disallow submission points pertaining to R109, R110, R111.
		Oppose	We oppose the proposed deletion of point (f) of R136.	Metering if water is important if landowners are to stay within the daily water limit.	Disallow submission point pertaining to point (f) of R136.
NZ Pork P.O. Box 4048 Wellington 6140 Attn: Anita Murrell	S359	Oppose	We oppose the submission point pertaining to Rule 83.	Discharge of collected animal effluent to land from existing farming activities should be a controlled activity.	Disallow submission point pertaining to Rule 83.

Signed



Amelia Geary

Regional Conservation Manager – Lower North Island

24 March 2016