

12 June 2017

PO Box 588
Level 6, 8 Willis Street
Wellington 6140, New Zealand
Phone 04 472 2261
Email admin@spencerholmes.co.nz

Proposed Natural Resources Plan Hearing Panel
Greater Wellington Regional Council
PO Box 11646
Manners Street
Wellington 6142

Dear Sir/Madam,

Hearing Statement - Spencer Holmes Ltd (Submitter S273) Hearing 1

Spencer Holmes Ltd is disappointed that the Proposed Natural Resources Plan (PNRP) only tinkers with existing rules so as to try and cover more activities and set higher thresholds for obtaining resource consents. In particular, the PNRP does not distinguish the urban environment or provide for the use and development of urban areas as required by the National Policy Statement on Urban Development Capacity 2016 (NPS-UDC).

While the major responsibilities of the NPS-UDC relate to local authorities, if the regional policies and rules don't allow the local authorities scope to implement the NPS-UDC then it will be ineffective. There needs to be coordination between all levels of decision makers under the RMA (i.e. by regional and local authorities) in order to allow the best outcomes as possible in achieving the NPS-UDC and other National Policy Statements.

We did not have sufficient available time to prepare a statement of evidence. However, we have reviewed the evidence for Wellington City Council (Submitter 286) by Mitch Lewandowski and for Porirua City Council (Submitter 163). We support these statements of evidence in respect of the need to amend the policy direction of the PNRP. In particular, with respect to the failure of the PNRP to take into consideration the benefits of urban environments in the region and the corresponding ability for District and City Council's to implement the NPS-UDC.

The use of non-complying activities together with policies that seek to 'avoid adverse effects' sets an impossibly high barrier to overcome where there are limited, if any, alternatives to develop urban areas. All of which ultimately impacts on the ability for landowners / developers to provide the urban environments as sought by the NPS-UDC.

For instance, Policy P102 relates to avoiding reclamation or drainage of beds of lakes or rivers with the related rule R127 being classified as a non-complying activity. We consider that the policy needs to better recognise the benefit of development in urban areas and makes such activities in urban zoned areas a discretionary activity.

As the Porirua City Council evidence notes, the s42A report 'Overall Policy Framework of the Proposed Plan – Part B' fails to properly consider the matter and erroneously classifies the issue as being only a local authority responsibility.

Consequently, we seek that the PNRP includes greater policy and rule support for urban environments throughout the PNRP.

Yours faithfully

Spencer Holmes Limited

A handwritten signature in blue ink, appearing to read 'D Gibson', with a long horizontal flourish extending to the right.

David Gibson
Senior Planner

adg@spencerholmes.co.nz