Proposed Natural Resources Plan:

Submitter:

Christine Edwards

Submitter Number:

S53

Form 5: Sul nission 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 8 of Schedule 1. Resource Management Act 1991

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70 Freepost 3156 Wellington Regional Council PO Boy 11646 Wellington 8142 Or entail tep-chalpish@gw.gov.nz Wellington Regional Council 20 SEP 2015

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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.

Attachment of Christine Edwards

21 Rosetta Rd

Rayman;

Accumati;

The specific provisions of the Proposed Natural Resources Plan (PNRP) that this submission relates to

The whole PNRP.

Submission on the provisions

Oppose and seek amendment.

Reasons for the submission

The whole PNRP, including the objectives, policies, rules, methods, schedules, maps and definitions, does not appropriately address and enable coastal hazard mitigation (including protection) measures including, in particular, for areas of significant existing development.

This applies both in the coastal marine area and in other areas, including beds of rivers and streams.

Appropriate coastal hazard mitigation (including protection) activities should be provided for as permitted or controlled activities.

Coastal hazard mitigation (including protection) activities should, at worst, be discretionary activities and, where resource consent is required, there should be provisions in the objectives and policies that would support consent being obtained, not provisions that would hinder consent being obtained.

The PNRP should clarify that, in contrast to risk management, hazard identification/risk assessment is an objective process and that any scientific or expert reports should be scientific and objective (not policy-based or precautionary) and report not only likely estimates but also their uncertainties, to enable submitters to participate in an informed way and to enable decision-makers to make informed decisions. This is important to a void the coastal hazard risk assessment and risk management problems that have occurred in Kapiti and that are occurring elsewhere in New Zealand.

The PNRP is not in accordance with the Resource Management Act 1991, including s 32, and sound resource management practice. The PNRP fails to give effect to the New Zealand Coastal Policy Statement 2010 and the Regional Policy Statement for the Wellington region.

Christine Edwards

Adequate and appropriate s 32 RMA evaluations and reports have not been undertaken or regarded.

The reasons in the submission of Coastal Ratepayers United Inc. are supported and adopted.

Decision sought:

Revise the whole PNRP, including the objectives, policies, rules, methods, schedules, maps and definitions, to appropriately address and enable coastal hazard mitigation (including protection) activities in the coastal marine area and other areas (including beds of rivers and streams), including especially for areas of significant existing development.

When making the revisions, pay particular attention to enabling coastal, hazard mitigation (including protection) activities in areas of significant existing development.

Include objectives and policies that recognise the importance and benefits of coastal hazard mitigation (including protection) activities, especially in areas of significant existing development.

Include objectives and policies that, if a resource consent is required, support that consent being obtained, not provisions that would hinder consent being obtained.

Provide for appropriate coastal hazard mitigation (including protection) activities to be permitted or controlled activities.

Provide for coastal hazard mitigation (including protection) activities to be, at worst, discretionary activities and ensure that none of them is (or could become due to other rules) a non-complying or prohibited activity.

Revise the PNRP to clarify that, in contrast to risk management, hazard identification/risk assessment is an objective process and that any scientific or expert reports are to be scientific and objective (not policy-based or precautionary) and report not only likely estimates but also their uncertainties, to enable submitters to participate in an informed way and to enable decision-makers to make informed decisions.

Ensure that the provisions of the PNRP comply with the Resource Management Act 1991, including that they give effect to the New Zealand Coastal Policy Statement 2010 and the Regional Policy Statement for the Wellington region.

Christine Echnards

Undertake appropriate s 32 evaluations and prepare revised s 32 reports, having proper regard to s 32 matters, including in relation to the implications of the PNRP for coastal hazard mitigation (including protection) activities. Have regard to those revised reports.

The decisions sought in the submission of Coastal Ratepayers United Inc. are supported and adopted in this submission.

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