



## ARA POUTAMA AOTEAROA THE DEPARTMENT OF CORRECTIONS FURTHER SUBMISSION ON PLAN CHANGE 1 TO THE NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION

**To:** Greater Wellington Regional Council  
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Attention: Andrea Millar – Manager, Resource Management and Land Management

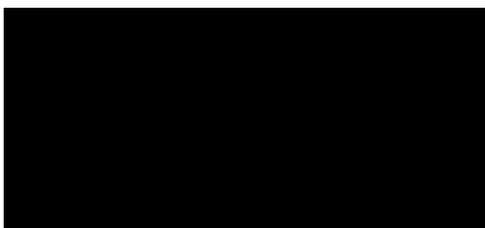
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Ara Poutama Aotearoa the Department of Corrections (**Ara Poutama**) makes further submissions on Plan Change 1 (**PC1**) to the Natural Resources Plan for the Wellington Region (**NRP**) in the **attached** document.

Ara Poutama, as a Central Government agency administering custodial and non-custodial corrections services in the Wellington region, has an interest in PC1 greater than the interest of the general public.

Ara Poutama would like to be heard in support of its further submission at a hearing. If others make a similar submission, Ara Poutama will consider presenting a joint case with them at the hearing.



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**Andrea Millar – Manager, Resource Management and Land Management**

For and on behalf of Ara Poutama Aotearoa the Department of Corrections

Dated this 8th day of March 2024.

Submitter that Ara Poutama are further submitting on	Submission no and point	Support or oppose	Submission description	Reason for support or opposition	Decision sought
Forest and Bird	S261.063	Oppose in part	Amend Policy WH.P2 Supports prohibition of unplanned greenfield development, however opposes clause (a). Considers financial contributions as compensatory measures for stormwater contamination contrary to RMA s107, the NZCPS, and the effects management hierarchy under the NPSM. Considers financial contributions are not an "offset". Considers livestock should be excluded from ephemeral watercourses, estuaries, and wetlands, as they have high ecological value. Considers additional direction is required to give clear scope for managing rural land uses.	Ara Poutama opposes the amendments requested to clause (a) of policy WH.P2. Ara Poutama opposes the request to include a new clause: "(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited". With respect to the amendments requested to clause (a), Ara Poutama opposes these on the basis that they are inconsistent with the decision requested by Ara Poutama on clause (a). With respect to the new clause (i) requested, Ara Poutama opposes this on the basis that the phrase "may lead to a decline in water quality" is uncertain in terms of the range of land use activities that it may apply to.	Disallow in part
Forest and Bird	S261.073	Oppose	Amend Policy WH.P11 Considers higher levels of control (i.e. consents) are required where stormwater is coming from a high risk location.	Ara Poutama opposes the request to amend policy WH.P11 to require resource consent for all discharges of stormwater from high risk industrial or trade premises. Subject to its submissions on the rules for discharges from high risk industrial or trade premises, Ara Poutama considers that it is reasonable to provide for these discharges as a permitted activity, subject to appropriate standards.	Disallow
Forest and Bird	S261.075	Oppose in part	Amend Policy WH.P14 Considers reducing adverse effects to "the extent practicable" enables cost considerations to be factored into decision-makers, which often avoid more environmentally responsible approaches. Considers reference to "where possible" is required.	Ara Poutama opposes the request to amend policy WH.P14 to replace the word "practicable" with "possible". Replacing "practicable" with "possible" sets a high and potentially unachievable threshold for the reduction of adverse effects of stormwater runoff from existing urban areas.	Disallow in part
Forest and Bird	S261.099	Oppose in part	Oppose Rule WH.R5 Considers greater Council oversight is required for elements of the rule, noting clause (h) is not sufficiently certain and enforceable for a permitted activity. Reclassify as a controlled activity. Include enforceable alternative standards. Considers higher activity status and adding clearer and enforceable standards are required to ensure compliance with RMA s70, and that cumulative significant adverse effects do not arise. Distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification. Require "water sensitive urban design" as a condition of consent, including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens.	Ara Poutama opposes the request to amend the activity status of stormwater discharge rule WH.R5 from permitted to controlled. Ara Poutama considers that it would not be efficient or effective to require resource consent for all discharges from new or redeveloped impervious surfaces.	Disallow in part
Forest and Bird	S261.142	Oppose in part	Amend Policy P.P2 Supports prohibition of unplanned greenfield development, however opposes clause (a). Considers financial contributions as compensatory measures for stormwater contamination contrary to RMA s107, the NZCPS, and the effects management hierarchy under the NPSM. Considers financial contributions are not an "offset". Considers livestock should be excluded from ephemeral watercourses, estuaries, and wetlands, as they have high ecological value. Considers additional direction is required to give clear scope for managing rural land uses.	Ara Poutama opposes the amendments requested to clause (a) of policy P.P2. Ara Poutama opposes the request to include a new clause: "(i) land use intensification that individually or cumulatively may lead to a decline in water quality is prohibited". With respect to the amendments requested to clause (a), Ara Poutama opposes these on the basis that they are inconsistent with the decision requested by Ara Poutama on clause (a). With respect to the new clause (i) requested, Ara Poutama opposes this on the basis that the phrase "may lead to a decline in water quality" is highly uncertain and potentially open-ended in terms of the range of land use activities that it may apply to.	Disallow in part
Forest and Bird	S261.153	Oppose	Amend Policy P.P11 Considers higher levels of control (i.e. consents) are required where stormwater is coming from a high risk location.	Ara Poutama opposes the request to amend policy P.P11 to require resource consent for all discharges of stormwater from high risk industrial or trade premises. Further to its submissions on the rules for discharges from high risk industrial or trade premises, Ara Poutama considers that it is reasonable to provide for these discharges as a permitted activity, subject to appropriate standards.	Disallow
Forest and Bird	S261.155	Oppose in part	Amend Policy P.P13 Considers reducing adverse effects to "the extent practicable" enables cost considerations to be factored into decision-makers, which often avoid more environmentally responsible approaches. Considers reference to "where possible"	Ara Poutama opposes the request to amend policy P.P13 to replace the word "practicable" with "possible". Replacing "practicable" with "possible" sets a high and potentially unachievable threshold for the reduction of adverse effects of stormwater runoff from existing urban areas.	Disallow in part

Submitter that Ara Poutama are further submitting on	Submission no and point	Support or oppose	Submission description	Reason for support or opposition	Decision sought
			is required.		
Forest and Bird	S261.176	Oppose in part	<p>Oppose Rule P.R5</p> <p>Considers greater Council oversight is required for elements of the rule, noting clause (h) is not sufficiently certain and enforceable for a permitted activity. Reclassify as a controlled activity.</p> <p>Include enforceable alternative standards.</p> <p>Considers higher activity status and adding clearer and enforceable standards are required to ensure compliance with RMA s70, and that cumulative significant adverse effects do not arise.</p> <p>Distinguish between discharges that would not have significant adverse effects on aquatic life and those having such effects that then require consent under a higher activity classification.</p> <p>Require "water sensitive urban design" as a condition of consent, including rainwater storage tanks at a property level (which are accessible to provide water for gardening and emergency water supply) and stormwater treatment via wetlands, swales, and rainwater gardens.</p>	<p>Ara Poutama opposes the request to amend the activity status of stormwater discharge rule P.R5 from permitted to controlled.</p> <p>Ara Poutama considers that it would not be efficient or effective to require resource consent for all discharges from new or redeveloped impervious surfaces.</p>	Disallow in part