Submitter ID:

File No:



Further Submission

on Proposed Natural Resources
Plan for the Wellington Region



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Clause 8 of Schedule 1, Resource Management Act 1991.

Please complete this form to make a further submission on the Proposed Natural Resources Plan for the Wellington Region (PNRP). All sections of this form need to be completed for the submission to be accepted.

A further submission may only be made by a person representing a relevant aspect of the public interest, or a person that has an interest in the PNRP greater than the interest that the general public has, or the Wellington Regional Council itself. A further submission must be limited to a matter in support of, or in opposition to, a submission made on the PNRP.

For information on making a further submission see the Ministry for the Environment website: www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change

Return your signed further submission to the Wellington Regional Council by post or email by 5pm Tuesday 29 March 2016 to:

Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan
for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

Regionalplan@gw.govt.nz

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FreePost Authority Number 3156







Greater Wellington Regional Council
Further Submission on Proposed Natural Resources Plan for the Wellington Region
Freepost 3156
PO Box 11646
Manners Street
Wellington 6142

FORM 6: FURTHER SUBMISSION FORM

This is a further submission in support of, or opposition to, a submission on the PNRP.

A. DETAILS OF FURTHER SUBMITTER

submission at any hearing.

A. DETAILS OF FORTHER SOL	
FULL NAME	
Bev Abbott	
ORGANISATION (* the organisation that	this submission is made on behalf of)
Wellington Botanical Society	
ADDRESS FOR SERVICE (INCLUDIN	G POSTCODE)
40 Pembroke Rd Northland Wellington 6012	
PHONE	FAX
04 475 8468	
EMAIL	
bevabbott@xtra.co.nz	
Only certain people may make fur	ther submissions
Please tick the option that applies to you:	
⊠I am a person representing a relevant as	pect of the public interest; or
I am a person who has an interest in the	PNRP that is greater than the interest the general public has.
Specify below the grounds for saying that y	ou are within the category you have ticked.
	cal Society includes advocating for the protection of lands and waters under protected her objectives including encouraging the study of botany, particularly the NZ flora, and places, especially in the field.
Service of your further submission	on
Please note that you must serve a copy of this further submission has been provided.	this further submission on the original submitter no later than five working days after ed to Wellington Regional Council.
If you have made a further submission on a on each original submitter.	number of original submissions, then copies of your further submission will need to be served
Signature:	Date:
Signature of person making further submis signature is not required if you make your s	sion or person authorised to sign on behalf of person making the further submission. A submission by electronic means.
Please note	
	ssion under the Resource Management Act 1991 becomes public information. All ite and will include all personal details included in the further submission.
B. APPEARANCE AT HEARING	
Please select from the following:	
\square I do not wish to be heard in support of m	further submission; or
☐I do wish to be heard in support of my fu	ther submission; and, if so,

□I would be prepared to consider presenting this further submission in a joint case with others making a similar further

Please enter further submission points in the table on the following pages

C. FURTHER SUBMISSION POINTS

Please complete the following table with details of which original submission points you support and/or oppose, and why, adding further rows as necessary.

Details of the submission you are commenting on Name of person/ group making original submission and postal address.	Original submission number The original submission number can be found on the submitter address list.	Position Whether you support or oppose the submission.	Part(s) of the submission you support or oppose Indicate which parts of the original submission (which submission points) you support or oppose, together with any relevant PNRP provisions.	Reasons Why you support or oppose each submission point.	Relief sought The part or whole of each submission point you wish to be allowed or disallowed.
e.g. Joanne Bloggs 12 Pine Tree Avenue Redwood	e.g. submitter S102	e.g. Oppose	e.g. Oppose all of submission point S102/41	e.g. The submission point does not recognise	e.g. Disallow the parts of \$102/41 relating to
Queen Elizabeth II National Trust	S157	Support	QEII Trust argues that the indigenous biodiversity values of Taupō Swamp warrant 'outstanding' status. Wildlands has conducted a desk-based assessment of the biodiversity values of Taupō Swamp against the nine criteria in Schedule F3 by which outstanding wetlands can be assessed. The Taupō Swamp scored A for four criteria and B for a further four criteria. Wildlands noted that some of the B scores were likely to be at the high end of the range.	We agree that the indigenous biodiversity values of Taupō swamp justify outstanding status. We agree with the four "A" assessments (Representative, Threatened Environment Classification, Ecosystem or Habitat, and Seasonal or Core Habitat. We think the "B" rankings for Species and Ecosystems may be underestimates. For example, the threatened plant assessments are based on 1981 field surveys, and there is no information about the diversity of invertebrates groups such as snails. Nor is there any information about the ecological processes operating in the different habitats.	Add Taupō Swamp to Schedule A3, the list of wetlands with outstanding biodiversity values Undertake further assessments including on-site mapping of habitat types and species surveys before accepting Wildlands "B" rankings and justification statements for Species and Ecosystems. We look forward to seeing more detailed information about the indigenous biodiversity values of Taupō Swamp when the draft KNE Plan for the Taupō Valley Wetlands is released for public consultation.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought
			QEII Trust points out that Taupō Swamp is the receiving environment for the larger catchment, and notes the potential impacts on Taupō Swamp of developments such as Porirua City Council's Northern Growth Area Structure Plan. QEII Trust points out that stricter rules apply to Outstanding Wetlands than to less significant wetlands.	We are very concerned about the significant damage that could be done to Taupō Swamp's ecological processes and indigenous biodiversity if the Natural Resources Plan does not include strict rules to avoid, remedy or mitigate negative environmental impacts arising from the extensive subdivision anticipated in PCC's Plan. Classifying Taupō Swamp as Outstanding is an efficient way of ensuring stricter rules will apply to the subdivision applications. It would also reduce reliance on the Precautionary Principle P3 given the significant gaps in the information available to applicants, GWRC and PCC about the values of Taupō Swamp.	Add Taupō Swamp to Schedule A3, the list of wetlands with outstanding biodiversity values
			QEII Trust has not commented on this.	We would be very concerned about any reduction in opportunities for public consultation on resource consent applications for the subdivision.	
			QEII Trust has not commented on this.	Historic heritage values include its use by early Māori occupying the pā at the mouth of the Taupō Stream, the commercial flax production when attempts by pākehā to drain the swamp failed, and the visit by the Queen to see the work of the Queen Elizabeth II National Trust which was renamed to celebrate her Silver Jubilee.	Add Taupō Swamp to Schedule E5: Historic Heritage Freshwater Sites.

Details of the submission you are commenting on	Original submission number	Position	Part(s) of the submission you support or oppose	Reasons	Relief sought

If you require more space for additional comments, please insert new rows as needed