Submission in support of, or in opposition to, submissions on *Proposed RPS change 1 for the Wellington Region.*

1. Details of further submitter: Manor Park Golf Club (Incorporated) (MPGC).

Address for service of person making further submission

- a. Contact Person: Win van der Velde
- **b. Email:** windv@hotmail.com
- c. Postal address: Golf Road, Lower Hutt, 5019
- 2. MPGC is a person who has an interest in the proposal that is likely to be greater than the interest the general public has.
- 3. The grounds for being in the above category are that MPGC resides in a community that could be affected by adjacent changes in zoning land from rural to industrial.
- 4. MPGC does not wish to be heard in support of this submission.
- 5. If others make a similar submission, MPGC will consider presenting a joint case with them at a hearing.
- 6. Further Submitter Details
 - a. Signature of person making further submission



Email: anne.alkema3@gmail.com

b. Signatory name, position, and organisation
Dr Anne Alkema, MPGC Board Member, on behalf of

Win van der Velde, President, MPGC

Date: 8 March 2024

This submission is in support or opposition to submissions by the following parties on Proposed Change 1 to the Natural Resources Plan for the Wellington Region ("PC1"):

S177 Transpower New Zealand Limited

S188 Wellington Fish and Game Council

S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)

S220 Rosco Ice Cream Ltd

S256 Waste Management NZ Limited

Our further submission is:

Manor Park Golf Club (Incorporated) supports or opposes parts of each of the abovementioned submissions, as identified below.

Submitter Name	Submission Point Number	Stance	Reasons	Decision Sought
S177 Transpower New Zealand Limited	S177.003 S177.014	Support	Requests a definition of "greenfield development", as does S220.001. This would provide clarity for any proposed development. But also noting that is the definition as proposed would need further definition of the term "regionally significant infrastructure".	Allow
S177 Transpower New Zealand Limited	S177.010 S177.021 S177.031	Oppose	Requests removal of the term contaminants and leave only hazardous substances, as it is impractical to avoid the former. The term "contaminants" should remain, as along with hazardous substances they should be avoided in storm water discharge.	Disallow
S188 Wellington Fish and Game Council	All submission points	Support	In keeping with the sanctuary environment status that the MPGC has established and is looking to maintain.	Allow
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.005 S216.007	Oppose	Requests wording change from 'prohibiting' to 'restricting' unplanned greenfield development. Maintaining 'prohibited' activity means, A prohibited activity may not be carried out. In addition, no resource consent can be sought or granted to authorise the activity. Parties wishing to carry out a prohibited activity must apply for	Disallow

			a change to the plan to reclassify the activity ¹ Shifting to a "restricted" activity means A restricted discretionary activity requires a resource consent before it can be carried out. The consent authority can exercise discretion as to whether or not to grant consent, and to impose conditions, but only in respect of those matters over which it has restricted its discretion in the plan or over which discretion is restricted in national environmental standards or other regulations ² This requested change implies the need for flexibility and discretion and it is not clear the extent to which there would be consistency in determining what should be allowed in a "restricted" definition and it is also unclear the extent to which there would be community consultation.	
S216 Te Rūnanga o Toa Rangatira (Te Rūnanga)	S216.006 S216.008	Oppose	Requests wording change from 'prohibited to 'non-complying' for storm water discharges in unplanned greenfield development. This means discharges can occur "with a resource consent" ³ meaning they may be allowable. This goes against the intent of the long- term freshwater vision for both Te Awarua-o-Porirua and Te Whanganui-a-Tara.	Disallow
S220 Rosco Ice Cream Ltd	S220.001	Support	Requests a definition of "greenfield development" as does S177.003 This would provide clarity for any proposed development.	Allow

¹ See https://www.environmentguide.org.nz/rma/resource-consents-and-processes/ ² Ibid.

³ Ibid

S220 Rosco Ice Cream Ltd	S220.004	Oppose	Requests definition change to allow storm water discharge to be more for developed sites than undeveloped grassed sites. This implies stormwater discharges could happen in an uncontrolled manner with the potential for contaminated and hazardous substances entering the waterways. This goes against the intent of the long- term freshwater vision for both Te Awarua-o-Porirua and Te Whanganui-a-Tara.	Disallow
S220 Rosco Ice Cream Ltd	S220.005	Support	Will provide the opportunity for all developers to be 'on the same page'.	Allow
S220 Rosco Ice Cream Ltd	S220.013	Oppose	This is connected to S220.004 in relation to storm water discharge in unplanned greenfield developments. This implies stormwater discharges could happen in an uncontrolled manner with the potential for contaminated and hazardous substances entering the waterways. This goes against the intent of the long- term freshwater vision for both Te Awarua-o-Porirua and Te Whanganui-a-Tara.	Disallow
S220 Rosco Ice Cream Ltd	S220.016	Oppose	See S216.006 S216.008	Disallow
S220 Rosco Ice Cream Ltd	5220.021	Oppose	Requests 30 Benmore Crescent be excluded from HCC unplanned greenfield area as shown on Map 89 given the work that has occurred on the site and the consent applications that are underway. This is connected to S256.014. Note the consents have not been approved and there has been no community consultation. There needs to be time for the community to be	Disallow

			consulted on the two consents that have been lodged. Noting there was no community engagement during the first consent process.	
S256 Waste Management NZ Limited	S256.006	Oppose	Requests amendment to the definition of unplanned Greenfield development and also exclusion of sites for which consents have been lodged. This has the potential to impact on the Manor Park Community for which consents have been lodged for a resource recovery park at 30 Benmore Crescent. The consents have not yet been approved.	Disallow
S256 Waste Management NZ Limited	S256.014	Oppose	While planning is underway and consents lodged, these have not been approved. 30 Benmore Street is rural land zoned for rural purposes which does not include industrial and waste management land uses.	Disallow
S256 Waste Management NZ Limited	S256.007 S256.008	Oppose	Does not seem to consider the impact of industrial and trade activities and storm water discharge on water ways.	Disallow
S256 Waste Management NZ Limited	S256.004 S256.013	Neutral	Neutral	Allow