

Proposed Natural Resources Plan:

Submitter:

Donald Frampton

Submitter Number:

S16

To: Freepost 3156
 Wellington Regional Council
 PO Box 11646
 Wellington 6142

Or email: regionalplan@gw.govt.nz ✓

Your details

Full name: Donald Robert Frampton

Organisation name: _____
 (If applicable)

Address for Service: 10 Nuhaka Place, Paraparaumu Beach

POSTAL ADDRESS: P O Box 575, Paraparaumu, 5254

EMAIL ADDRESS: terson@xtra.co.nz

Telephone no's: Work: _____ Home: 04 2986-932 Cell: 0274-401-271

Contact person: Don Frampton

Address and telephone no (if different from above): _____

See Postal & email addresses as above (email preferred)

Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We will send you updates on the process, information and provide you with details of any meetings and the hearing. Please tick here if you do not agree to receive communication via email.

Email address: terson@xtra.co.nz

Trade competition

- I/we could not gain an advantage in trade competition through this submission. [Go straight to Your Submission]
- I/we could gain an advantage in trade competition through this submission.
 If you could gain an advantage please complete one of the following:
 - I/we are directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.
 - I/we are not directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Your submission

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/section number): <u>SEE MY ATTACHMENT</u>	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input checked="" type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<u>SEE MY ATTACHEMENT</u>
	I seek the following decision from WRC (give precise details): →	<u>SEE MY ATTACHEMENT</u>

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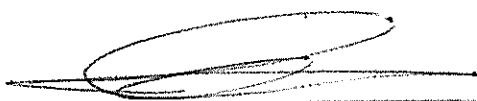
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If you have more submissions you wish to make, please find more boxes at the bottom of this document

Attendance and wish to be heard at hearing(s)

- I/We do wish to be heard in support of my/our submission
[Note: This means that you wish to speak in support of your submission at the hearing(s).]
- I/We do not wish to be heard in support of my/our submission
[Note: This means that you cannot speak at the hearing. However, you will still retain your right to appeal any decision made by the Wellington Regional Council to the Environment Court.]
- If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature:  Date: 13-9-15

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]

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: Donald Robert Frampton (Don Frampton)

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 measures (including but not limited to all means of protection - not excluding all means of temporary, portable, permanent, hard or soft wave-energy dampening technologies) in particular, as relates to areas of significant existing development.

This applies both in the coastal marine area and in other areas, including but not limited to 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 avoid 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.

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 but not limited to all means of protection - not excluding all means of temporary, portable, permanent, hard or soft wave-energy dampening technologies) activities in the coastal marine area and other areas (including but not limited to beds of rivers and streams), in particular, as relates to areas of significant existing development.

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

Include objectives and policies that recognise the importance and benefits of coastal hazard mitigation (including protection) activities as above referred, 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 as above referred) activities to be permitted or controlled activities.

Provide for coastal hazard mitigation (including protection as above referred) 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. By way of example only; there should be no restriction on taking temporary protection actions in the face of a high wave-energy episodic storm event where, (say), sand-bagging could help defend and reduce damage to the dune-line, notwithstanding other temporary or permanent wave-energy dampening options may simultaneously be in play.

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.

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 addition to and as they may overlap this submission.

