

FURTHER SUBMISSION ON BEHALF OF KAPITI COAST AIRPORT HOLDINGS LIMITED

To: Greater Wellington Regional Council
Further submission on Proposed Natural Resources Plan for the Wellington Region
P O Box 11646
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Wellington
Email: regionalplan@gw.govt.nz

1. **Kapiti Coast Airport Holdings Limited (KCAHL)** is a submitter and seeks to make further submissions on the Proposed Natural Resources Plan for the Wellington Region 2015 (Proposed Plan).
2. KCAHL is a significant landholder and owner of Kapiti Coast Airport and as such represents a relevant aspect of the public interest.
3. The submissions on which further submissions are made by KCAHL have a direct effect on the interests and operational capabilities of KCAHL.
4. KCAHL has an interest in the Proposed Plan that is greater than the public generally.
5. KCAHL makes the further submissions as set out in the **attached** table.
6. KCAHL wishes to speak at the hearing in support of its further submission.

DATE: 22 March 2016

Kapiti Coast Airport Holdings Limited

Address for Service

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Original submitter	Original submission number	KCAHL's position	Parts of submission supported or opposed	Reasons	Relief sought
Wellington International Airport Limited c/- Mitchell's Partnerships Ltd, PO Box 489 Dunedin, 9054 New Zealand	S282/005	Support	<p>3. Objectives:</p> <p>New Objective O# (amend numbering as necessary) - Development of regionally significant infrastructure - Provide for and enable the development and growth of regionally significant infrastructure.</p>	KCAHL supports the need to specifically recognise the enablement and growth of regionally significant infrastructure.	Accept new objective.
NZ Transport Agency Attn: Caroline Horrox, PO Box 5084 Lambton Quay Wellington, 6145 New Zealand	S146/064	Support	<p>3. Objectives</p> <p>Add new objective: <u>Discharges associated with regionally significant infrastructure are managed through the adoption of the best practicable option.</u></p>	KCAHL supports the need to specifically provide for ancillary activities associated with regionally significant infrastructure, including discharge consents.	Accept new objective.
Wellington International Airport Limited c/- Mitchell's Partnerships Ltd, PO Box 489 Dunedin, 9054 New Zealand	S282/013	Support	<p>Objective O21:High hazard areas</p> <p>Amend Objective O21 as follows:</p> <p>Inappropriate use and development in high hazard areas is avoided, <u>and where avoidance is impracticable or for reasons of functional need or operational requirements, the effects of use and development in high hazard areas should be remedied or mitigated.</u></p>	<p>The definition of high hazard area is <i>"for the purposes of the Plan, all areas in the coastal marine area and the beds of lakes and rivers are high hazard areas."</i></p> <p>This definition is broad and the objective proposes that areas are "avoided". This may not be practicable in all cases, particularly where there is a functional or operational need for an activity to</p>	Amend objective.

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				locate in that area.	
Wellington International Airport Limited c/- Mitchell's Partnerships Ltd, PO Box 489 Dunedin, 9054 New Zealand	S282/020	Support	Objective O47: Sediment runoff Delete O47	The objective requires that: "The amount of sediment-laden runoff entering water is reduced." The wording of this objective is inappropriate and should be amended or deleted.	Delete or amend objective.
Wellington City Council Attn: Alison Newbald, PO Box 2199 Wellington, 6140 New Zealand	S286/006	Support	4. Policies Remove the use of 'avoid' in the policies.	KCAHL supports the need to carefully review and amend proposed policies that require avoidance of effects. In many cases, effects can be appropriately mitigated or remedied. Objectives seeking to avoid effects should also be considered carefully.	Review objectives and policies to ensure total avoidance effects of effects is only required in limited circumstances and where warranted. Amend objectives and policies to appropriately recognise that mitigation or remediation of effects can be appropriate.
Wellington International Airport Limited c/- Mitchell's Partnerships Ltd, PO Box 489 Dunedin, 9054 New Zealand	S282/037	Support	Policy P31: Aquatic ecosystem health and mahinga kai Amend Policy P31 as follows: Aquatic ecosystem health and mahinga kai shall be maintained <u>and, where appropriate,</u> or restored by managing the effects of use and development on physical, chemical and biological processes to: a) minimise <u>avoid, remedy or mitigate</u> adverse effects on natural flow characteristics and hydrodynamic	The amendments proposed better reflect the requirements and language of the RMA.	Accept amendments or words to like effect.

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			<p>processes, and the natural pattern and range of water level fluctuations in rivers, lakes and natural wetlands, and</p> <p>b) minimise <u>avoid, remedy or mitigate</u> adverse effects on aquatic habitat diversity and quality, including the form, frequency and pattern of pools, runs, and riffles in rivers, and the natural form of rivers, lakes, natural wetlands and coastal habitats, and</p> <p>c) minimise <u>avoid, remedy or mitigate</u> adverse effects on habitats that are important to the life cycle and survival of aquatic species, and</p> <p>d) <u>avoid, remedy or mitigate</u> adverse effects at times which will most affect the breeding, spawning, and dispersal or migration of aquatic species, and</p> <p>e) avoid creating barriers to the migration or movement of indigenous aquatic species, and restore the connections between fragmented aquatic habitats where appropriate, and</p> <p>f) minimise <u>avoid, remedy or mitigate</u> adverse effects on riparian habitats and restore them where practicable, and</p> <p>g) avoid the introduction, and restrict the spread, of aquatic pest plants and animals.</p>		
NZ Transport Agency Attn: Caroline Horrox, PO Box	S146/147	Support	<p>Rules 5.2.3 Stormwater</p> <p>Add a new rule:</p> <p><u>Existing permitted or otherwise lawfully established discharges of stormwater into water or onto or into land</u></p>	The proposed rule would provide appropriate recognition of regionally significant infrastructure.	Accept new rule.

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5084 Lambton Quay Wellington, 6145 New Zealand			<u>where it may enter water from a port, airport, railway or state highway existing at the date of notification of the Proposed Natural Resources Plan is a permitted activity.</u>		
NZ Transport Agency Attn: Caroline Horrox, PO Box 5084 Lambton Quay Wellington, 6145 New Zealand	S146/122	Support	Policy P97: Managing sediment discharges Amend Policy 97: The discharge of sediment to surface water bodies and coastal water from earthworks activities shall be minimised <u>avoided, remedied or mitigated to the extent practicable</u> by using a source control approach. Good management practices shall be used in site erosion and sediment control design operation and maintenance in order to minimise the adverse effects of sediment-laden stormwater discharges. Effects that cannot be minimised may be appropriately offset.	The amendments proposed better reflect the requirements and language of the RMA.	Accept amendments or words to like effect.