

IN THE MATTER OF the Resource
Management Act 1991

AND

IN THE MATTER OF The Proposed One Plan notified by
Manawatu-Wanganui Regional
Council

**STATEMENT OF EVIDENCE OF EMILY SUZANNE GRACE
FOR NEW ZEALAND DEFENCE FORCE
BIODIVERSITY SUBMISSIONS ON THE PROPOSED ONE PLAN**

Dated: 11 July 2008

1.0 Introduction

1.1 My full name is Emily Suzanne Grace.

1.2 I have been employed by Tonkin & Taylor Limited for the last three and a half years as a Resource Management Practitioner. I hold a Bachelor of Science degree with Honours in Physical Geography and a Bachelor of Laws. I have five years experience in the planning and resource management profession, working for both local authorities and the private sector.

1.3 As part of my role at Tonkin and Taylor Limited I have reviewed and made submissions on a number of proposed planning documents, including regional policy statements, regional plans and district plans. I also regularly prepare resource consent applications to both regional and district councils, and process district council applications.

1.4 I am familiar with the Proposed One Plan (One Plan) to which these proceedings relate.

1.5 I appear at the request of the New Zealand Defence Force (NZDF), who lodged a submission and further submissions on the One Plan.

1.6 In preparing my evidence I have reviewed the Environment Court Code of Conduct for Expert Witnesses and I agree to comply with it.

2.0 Summary of Evidence

2.1 This evidence addresses NZDF's main biodiversity-related issues with the One Plan, which were identified in NZDF's original submission, and are the subject of this hearing and recommendations contained in the Horizons Regional Council's Planners Report on Submissions to the Proposed One Plan – Biodiversity, by Helen Marr (Planners Report) and related Section 42A Reports.

2.2 NZDF had an informal meeting with Horizons Regional Council (HRC) staff members Helen Marr and Natasha James on 23 May 2008, which I also attended, to discuss NZDF's submission points. Substantive progress was made at this meeting towards resolving NZDF's outstanding biodiversity-related issues. I note that the Planners Report and recommendations take account of the outcomes of this meeting. Minutes of this meeting, prepared by NZDF and amended by HRC, are included as Appendix 1 to this evidence. This evidence is therefore largely in support of the recommendations contained in the Planners Report.

2.3 The statement provided by Mr Rob Owen of NZDF at the Overall One Plan Hearing on 3 July 2008 provides background to my evidence. In summary, much of NZDF's extensive landholdings contain rare and threatened and at-risk habitats. Generally, NZDF's concerns with the biodiversity-related provisions of the One Plan relate to ensuring sufficient provision is made to allow for the day-to-day activities that are undertaken within NZDF land, including habitat maintenance and essential training activities using live ammunition. NZDF cannot accept the level of restriction to its legitimate activities that would result from the way the One Plan is currently written.

2.4 The main biodiversity-related issues that NZDF has with the One Plan are as follows:

- (a) NZDF is concerned that Objective 7-1 (indigenous biological diversity) is overly restrictive as it is currently written. My evidence supports NZDF's request, and the

Planners Report recommendation, to add the words “more than minor” into the Objective.

- (b) NZDF is concerned that Policy 7-2 (activities in rare and threatened habitats) and Policy 7-3 (activities in at-risk habitats), and Rules 12-7 and 12-8, while providing for habitat enhancement, do not provide for habitat maintenance and therefore do not provide for NZDF’s habitat maintenance activities within its extensive land holdings, particularly within the Waiouru Military Training Area. My evidence supports NZDF’s request, and the Planners Report recommendation, to add the word “maintenance” into Policies 7-2 and 7-3 and the word “maintaining” into Rules 12-7 and 12-8.
- (c) NZDF notes the Planners Report recommendation that a new clause is added to Policy 7-2 (activities in rare and threatened habitats) to make provision for infrastructure of regional and national importance. My evidence provides general support for this recommended new clause, and suggests an amendment to it in accordance with NZDF’s concerns with other infrastructure-related provisions.
- (d) NZDF would like the One Plan to acknowledge non-regulatory management programmes for representative habitats initiated by landowners, as well as programmes initiated by HRC. My evidence acknowledges the reasons in the Planners Report for rejecting NZDF’s submission point on Policy 7-4 (proactive management of representative habitats) and expresses support for Policy 7-5 (fostering an ethic of stewardship) as an alternative to NZDF’s request in its original submission.
- (e) NZDF supports the methods in Section 7.5 of the One Plan. My evidence confirms NZDF’s support for the recommendations in the Planners Report to retain these methods with minor amendments.
- (f) NZDF requests that an exception is provided to Rules 12-7 and 12-8 for activities carried out for the purposes of military training using live ammunition under the Defence Act 1990. My evidence supports NZDF’s request, and the Planners Report

recommendation, to add such an exception to Rules 12-7 and 12-8.

3.0 Objective 7-1: Indigenous biological diversity

3.1 This issue relates to NZDF's submission point on Objective 7-1. This issue is discussed in the Planners Report on pages 32 and 33 and recommendation BIO 5.

3.2 NZDF's original submission requested the removal of the word "any" and the addition of the words "more than minor" to Objective 7-1. It is the Planners Report recommendation (BIO 5) to make these changes to the Objective. The Planners Report recommendation is that Objective 7-1 (a) be written as follows:

The existing level of indigenous biological diversity is maintained into the future by ensuring that:

(a) "rare and threatened habitats, as defined in Schedule E, are protected from activities that may cause more than minor loss or modification to the representativeness, rarity and distinctiveness or ecological context of the rare and threatened habitat*, as assessed in accordance with Table 7.1"*

3.3 I support this wording of Objective 7-1 (a) and recommend that the Planners Report recommendation BIO 5 is accepted by the Hearings Committee.

3.4 I agree with the reasoning in the Planners Report for including the term "more than minor" in the Objective. The wording of the Objective, as proposed in the Planners Report recommendation, would meet the requirements of Section 6(c) of the Resource Management Act 1991 (RMA) by providing protection of rare and threatened habitats. It would also allow for activities that would have a less than minor effect on these habitats to take place, which I consider is consistent with the sustainable management approach of the RMA.

3.5 In addition, the rules contained in Chapter 12 of the One Plan do allow for some activities to occur within rare and threatened habitats. There are no prohibited activities specified. It is important that Objective 7-1 and the rules are consistent and Objective 7-1 makes provision for activities to occur within rare and threatened habitats. It is my

opinion that as currently written, Objective 7-2 does not make this provision. However, I consider that the changes recommended in the Planners Report would make sufficient provision.

4.0 “Maintenance”

4.1 This issue relates to NZDF’s submission points on Policy 7-2 (activities in rare and threatened habitats), Policy 7-3 (activities in at-risk habitats), and Rules 12-7 and 12-8. These submission points are discussed in the Planners Report on pages 46-48 (recommendation BIO 7), pages 52-53 (recommendation BIO 8), pages 100-102 (recommendation BIO 27), and pages 109-111 (recommendation BIO 28).

4.2 NZDF’s original submission requested that maintenance of habitat be provided for within Policy 7-2, Policy 7-3, Rule 12-7, and Rule 12-8 of the One Plan. These policies and rules currently provide for habitat enhancement only. The Planners Report recommendations are to add the word “maintenance” into Policies 7-2 and 7-3 and the word “maintaining” into Rules 12-7 and 12-8.

4.3 The Planners Report recommendations are for clause (c) of both Policy 7-2 and Policy 7-3 to read as follows:

“(c) The activities described in subsection (b) will be allowed where they are for the purpose of pest control or habitat maintenance or enhancement.”

And for clause (f) of both Rule 12-7 and Rule 12-8 to read as follows:

“This rule does not apply to the activities described in subsections (a) to (d) in circumstances where:

(f) they are carried out for the purposes of protecting, maintaining, or enhancing an at-risk / rare or threatened habitat”*

4.4 I support these proposed changes and recommend that the Planners Report recommendations relating to these changes are accepted by the Hearings Committee.

4.5 The Planners Report states that allowing for maintenance as well as enhancement of habitat is a good and sensible change to make to the One Plan, and I agree with this. Maintenance of habitat is consistent with the sustainable management purpose of the RMA. Maintenance of habitat is an important activity that has a positive effect by stopping the degradation of habitat.

4.6 It is my opinion that allowing for maintenance does not detract from the importance of enhancement. Rather, it recognises the importance of maintenance activities and that enhancement of habitat is not always necessary or practical.

5.0 New clause (d) in Policy 7-2 (activities in rare and threatened habitats)

5.1 This issue relates to NZDF's submission points on the Policy 7-2 and Policy 3-1 (benefits of infrastructure). This issue is discussed in the Planning Report on pages 46-48 (recommendation BIO 7).

5.2 In response to submissions made on Policy 7-2, one of the Planners Report recommendations is that a new clause (d) is added to Policy 7-2 to make provision for infrastructure of regional and national importance. This clause would state:

“(d) The activities described in subsection (b) may be allowed where the activity is for the purpose of providing or maintaining infrastructure of regional or national importance as identified in Policy 3-1 and ...”

5.3 I generally support this recommended new clause. I consider that it is appropriate to make provision for some habitat modification for the purposes of providing infrastructure of regional and national importance, particularly where that infrastructure provides for a community's wellbeing and/or health and safety. The sub-clauses (i) to (iv) of the suggested addition restricts the application of the exception to circumstances where effects on habitat would be no more than minor or could be offset by financial contributions. This restriction on the exception therefore only allows for minor habitat modification to occur, which is consistent with Objective 7-1 and the sustainable management purpose of the RMA.

5.4 I recommend an amendment is made to proposed clause (d), as follows (addition shown in underline):

“(d) The activities described in subsection (b) may be allowed where the activity is for the purpose of providing or maintaining infrastructure and related facilities of regional or national importance as identified in Policy 3-1 and ...”

5.5 This recommendation is in accordance with NZDF’s original submission point on Policy 3-1, requesting that all of NZDF facilities are included as infrastructure. This point will be further addressed at the Infrastructure, Energy and Waste Hearing. In summary, although not all NZDF facilities would fit within the definition of infrastructure contained in the RMA, these facilities are associated with infrastructure (for example the Ohakea air base is associated with the Ohakea air field), they have infrastructure characteristics such as representing a large investment in facilities that would be extremely difficult, if not impossible to replace, and NZDF facilities are nationally important. It is my opinion that the amendment suggested above (para 5.4) would keep the application of the exception sufficiently restricted, as it would only extend the exception to facilities of regional and national importance that are associated with infrastructure.

5.6 I recommend that the Hearings Committee accepts clause (d) as recommended by the Planners Report recommendation, and also amends the clause to include the words “and related facilities”.

6.0 Non-regulatory management programmes

6.1 This issue relates to NZDF’s submission point on Policy 7-4 (proactive management of representative habitats). This issue is discussed in the Planning Report on pages 58-59 (recommendation BIO 9).

6.2 NZDF’s original submission stated that NZDF would be happy to establish management plans for open tussock grasslands in the Waiouru Military Training Area and the coastal dune area at Raumai, and requested that these areas were included in the management programme.

6.3 The Planners Report recommendation is to reject NZDF's submission point. I agree with the reasoning for this recommendation. In summary, Policy 7-4 is aimed at HRC initiated non-regulatory programmes. As HRC does not currently have a management programme for tussock grasslands, and has no funding to develop one, Policy 7-4 should not refer to tussock grasslands.

6.4 NZDF would like the One Plan to acknowledge non-regulatory management programmes for representative habitats initiated by landowners, as well as programmes initiated by HRC. In this respect, it is my opinion that Policy 7-5 (fostering an ethic of stewardship) provides for this acknowledgement and addresses NZDF's initial concern about Policy 7-4.

6.5 I agree with the Planners Report recommendation BIO 10 to retain Policy 7-5 unchanged and request that the Hearings Committee accepts this recommendation.

7.0 Methods

7.1 This issue relates to NZDF's submission point on the Methods set out in Section 7.5 of the One Plan. This issue is discussed in the Planning Report on pages 64-77 and covers recommendations BIO 13 to BIO 19.

7.2 NZDF's original submission expressed general support for the methods in Section 7.5. NZDF is willing to take part as a landowner in the various projects specified, as appropriate.

7.3 I note that the Planners Report recommendations are to retain the methods with some minor amendments. I generally support these recommendations and request that the Hearings Committee accepts these recommendations.

8.0 Live ammunition exception

8.1 This issue relates to NZDF's submission point on Rules 12-7 and 12-8. This issue is discussed in the Planning Report on pages 101-102 (recommendation BIO 27) and pages 109-110 (recommendation BIO 28).

8.2 NZDF's original submission requested that an exception is provided to Rules 12-7 and 12-8 (activities in rare and threatened and at-risk habitats) for activities carried out for the purposes of military training using live ammunition under the Defence Act 1990. Live firing can cause vegetation clearance and land disturbance, and can be considered as a discharge of contaminants to land and/or water, so would be caught by the rules if an exception is not provided.

8.3 The Planners Report recommendations (BIO 27 and 28) are to add the requested exception to Rules 12-7 and 12-8 as a new clause (g) in each rule. Clause (g) would read as follows:

“This rule does not apply to the activities described in subsections (a) to (d) in circumstances where:

(g) they are carried out for the purposes of military training using live ammunition under the Defence Act 1990”

8.4 I support clause (g) as recommended in the Planners Report and recommend that the Hearings Committee accepts recommendations BIO 27 and BIO 28.

8.5 The reasoning in the Planners Report states that this request is a reasonable one. The Planners Report also states that NZDF could apply for a resource consent to cover these activities, or prepare a code of practice. It is my opinion that amending the One Plan by including the recommended clause (g) exception for military training is the most appropriate way to address this issue, for the following reasons:

- (a) Military training is an essential part of NZDF's role and live ammunition firing is an essential part of this training.
- (b) The Waiouru Military Training area is the only location in the North Island where live ammunition training can occur, other than within the artificial and very limiting environment of a built rifle range.
- (c) Live ammunition training has been undertaken in this area since the early part of the twentieth century and the area is a designated training area.

(d) NZDF has management practices in place for minimising the impact of live firing on the environment, similar though less extensive than a code of practice. The effects of this essential activity are therefore mitigated as much as is practicable.

8.6 I note that if NZDF were to apply for a consent for this activity, the application would be a discretionary or non-complying activity. As such, consent could be declined. This would be a situation that would be inappropriate to NZDF's role in national and international security.

8.7 In order to narrow the application of clause (g) to ensure that it does not provide an exception for activities that might have a significant effect on habitat (for example a new shooting range where the intensity of the discharge would be greater than typical training activities and focused on a specific area over an extended period of time), I suggest the following is added to the end of clause (g) (shown in underline):

“This rule does not apply to the activities described in subsections (a) to (d) in circumstances where:

(g) they are carried out for the purposes of military training using live ammunition under the Defence Act 1990 and they are carried out outside of a built shooting range that allows for ammunition to be discharged to an at-risk / rare and threatened habitat”

8.8 I consider that it is reasonable for military training activities that have the potential to cause a significant adverse effect on habitat to require a consent as a controlled activity. A controlled activity consent would provide HRC with the ability to impose conditions to minimise effects to habitat, while providing certainty to NZDF that essential military training can be undertaken. To this end, I recommend that the following controlled activity rule is added to the Rules Table (12.2) in Chapter 12:

Rule	Activity	Classification	Conditions/ Standards/ Terms	Control/Discretion/Non-notification
12 - ? Military activities within at-risk and/or rare and threatened habitats	Any discharge of ammunition from a built shooting range to an at-risk and/or rare and threatened habitat	Controlled		Control is reserved over: (a) measures to mitigate effects to habitat from the discharge (b) compliance with any management plans or best practice guidelines for the activity

9.0 Conclusion

9.1 NZDF's main concerns with the biodiversity-related provisions of the One Plan relate to ensuring that sufficient provision is made for NZDF's ongoing nationally important activities within rare and threatened and at-risk habitats.

9.2 Discussions have been held with HRC staff, and as a result NZDF is supportive of the majority of the recommendations made in the Planners Report.

9.3 It is my opinion that the recommendations in the Planners Report relating to NZDF's submission points are appropriate and should be accepted by the Hearings Committee, subject to further amendments I recommend to proposed clause (d) of Policy 7-2, clause (g) of Rule 12-7 and 12-8, and the addition of a new controlled activity rule.

Emily Grace, 11 July 2008

APPENDIX 1: Minutes of 23 May 2008 meeting

NZDF One Plan Meeting with Horizons Regional Council

Friday 23 May 2008, 10am, Horizons offices, Palmerston North

Present: Rob Owen, New Zealand Defence Force
 Elaine Stuart, New Zealand Defence Force
 Emily Grace, Tonkin & Taylor

Helen Marr, Horizons Regional Council
 Natasha James, Horizons Regional Council

1. INFRASTRUCTURE

NZDF facilities as infrastructure		
Policy 3-1 (a)	NZDF request	<ul style="list-style-type: none"> That all defence facilities are included as infrastructure
	HRC response	<ul style="list-style-type: none"> Defence facilities do not fit the RMA definition of infrastructure. HRC not willing to include defence facilities in definition as this would broaden the definition too far.
	Action	<ul style="list-style-type: none"> NZDF to consider further.
	NZDF Response	See submission on Policy 5-3 below.
Water and wastewater		
Policy 3-1 (a) (vii)	NZDF request	<ul style="list-style-type: none"> Provide for NZDF's community water and wastewater functions in the policy – amend (a)(vii) so that it is not specific to territorial authorities
	HRC response	<ul style="list-style-type: none"> Accept this point. Policy may refer to "community supply" – NZDF's facilities would meet definition of community supply, but would need to remove reference to CTs in definition.
	Action	<ul style="list-style-type: none"> HRC to amend policy.

2. LAND

Whole Farm Business Plans (WFBP)		
Obj 5-1, Policy 5-1, 5-2, 5-3, Rule 12-1, 12-3, 12-4	NZDF request	<ul style="list-style-type: none"> WFBPs should be available in respect of all land. Suggested a "Land Management Plan" for use on land other than farms.
	HRC response	<ul style="list-style-type: none"> Acknowledge this point. Farms are the main focus for Horizons. HRC sees Codes of Practice as the same thing as a WFBP, and wants to recognise these (see next point).
	Action	<ul style="list-style-type: none"> See below
Codes of Practice (CoP)		
Policy 5-5, Policy 12-2	NZDF request	<ul style="list-style-type: none"> Retain these policies recognising CoPs. Include words such as "timely and effective manner" in policy to indicate HRC's intent re plan changes for CoPs.

	HRC response	<ul style="list-style-type: none"> • Cannot include a CoP by reference, so will have to be a Plan Change process for new CoPs. • This process should be a formality if preparation work is done well. • HRC accepts NZDF's points. • WFBPs do not require plan change.
	Action	<ul style="list-style-type: none"> • HRC to amend Chapter 1 to include words that express HRC's intention to bring in plan changes to give effect to CoPs. • After receiving COP and approving it HRC can amend rules in Chapter 12 so that no consent is required if CoP is followed, same as for WFBPs. However as noted above this will require a plan change process if post notification. • NZDF to consider if there is a way for CoPs to also not require a plan change – would need very specific rule, like WFBPs.
	NZDF Response	HRC position accepted
Exception for fencelines		
Policy 5-3 (a) (iii)	NZDF request	<ul style="list-style-type: none"> • That the word fencelines is replaced with the words "essential facilities" or similar
	HRC response	<ul style="list-style-type: none"> • Must be careful to keep wording specific and not open the exception too wide
	Action	<ul style="list-style-type: none"> • NZDF to consider further
	NZDF Response	The policy refers to "... <i>fenceline or other infrastructure</i> ..." and is incorrect in that a fenceline is not "infrastructure" as defined. The policy would appear, on the face it, to provide for establishment of (for example) airports and power stations on highly erodible land! Our concern is simply that HRC appears to be prepared to extend the definition and treatment of "infrastructure" to fencelines but not to nationally significant Defence Facilities (see submission on Policy 3-1 above). We find that inconsistent and question whether this policy serves a resource management or a political purpose. Our original submission stands.

3. RARE AND THREATENED HABITATS

More than minor loss		
Obj 7-1	NZDF request	<ul style="list-style-type: none"> • That "more than minor" is added to the objective.
	HRC response	<ul style="list-style-type: none"> • Accept this point – it would make the objective more consistent with the policies.
	Action	<ul style="list-style-type: none"> • HRC to modify the objective.
Maintenance		
Policy 7-2, Policy 7-3, Policy 14-1 Rule 12-7,	NZDF request	<ul style="list-style-type: none"> • Add the word "maintenance" to the policies and rules to better reflect NZDF practices
	HRC response	<ul style="list-style-type: none"> • Accept this point.
	Action	<ul style="list-style-type: none"> • HRC to add the word "maintenance" to the policies

Rule 12-8, Rule 14-2		and rules.

Live ammunition		
Rule 12-7, Rule 12-8	NZDF request	<ul style="list-style-type: none"> Add a sub-clause to the list providing an exception for military training using live ammunition.
	HRC response	<ul style="list-style-type: none"> CoP would be a better way to manage this issue. There have been no further submissions against this submission.
	Action	<ul style="list-style-type: none"> HRC will consider this point further. Likely to include the requested change, or something similar.

4. Highly Erodible Land

Definition of Highly Erodible Land		
Schedule A	NZDF request	<ul style="list-style-type: none"> The identification of Highly Erodible Land is made more straight forward.
	HRC response	<ul style="list-style-type: none"> Have recommended a change to the definition of highly erodible land.
	Action	<ul style="list-style-type: none"> HRC to include new definition of Highly Erodible Land [new definition has been proposed in our submission to the Plan and will be included in the plan if accepted by hearing committee.].

5. “Per property per year”

Controls based on pre-property disturbance		
Chapter 12, Rule 13-25, Chapter 15	NZDF request	<ul style="list-style-type: none"> Controls for land disturbance and water takes/discharges based on “per-property” standards are not effects based and are unreasonable
	HRC response	<ul style="list-style-type: none"> Acknowledge that “per-property” is not ideal, but cannot think of a better way
	Action	<ul style="list-style-type: none"> NZDF to suggest alternative controls
	NZDF Response	<p>Controls for effects on land should be on a per hectare basis (recognising that if the land was subdivided then greater effects would be accepted and that the assimilative capacity of the land is per ha not per property.)</p> <p>Controls for effects on water should be in terms of the assimilative capacity of the receiving water. That could be represented by flow rate (m³/sec) or the area of the contributing catchment upstream of the discharge point, as a more easily measured surrogate.</p>

6. Discharge of Contaminants

Allowance for live ammunition		
Rule 13-25	NZDF request	<ul style="list-style-type: none"> That allowance is made for discharge of live ammunition to land that will not enter water

	HRC response	<ul style="list-style-type: none"> Accept this point. A more generic exception would be better, but it seems that specific reference to live ammunition is the best way.
	Action	<ul style="list-style-type: none"> HRC to alter rule

7. Hautapu Water Conservation Notice

Plan to be consistent with intent of Conservation Notice		
Policy 6-15 Policy 6-19 Rule table 15.2 Rule 16-1, Rule 16-2	NZDF request	<ul style="list-style-type: none"> The Conservation Notice should have no effect on new consents to replace expiring consents – intent of the Conservation Notice was to allow for “renewals”
	HRC response	<ul style="list-style-type: none"> May be no effect – need to check against core allocation in Appendix B. If meets core allocation, then controlled activity. Non-complying if not. Can amend Policy 6-19 by adding in “for public water supply”.
	Action	<ul style="list-style-type: none"> HRC to ask John to confirm how core allocation affects NZDF interests on Hautapu River. HRC to amend Policy 6-19. NZDF to consider issue further.
	NZDF Response	<ul style="list-style-type: none"> Core allocation is 112L/sec at Taihape. NZDF take is 63L/sec at the extreme upper limit of the catchment. We are unaware of the volume of other takes in the catchment but believe that Taihape’s community supply is taken from the Hautapu Catchment. We are not happy to rely on the core allocation approach and would like to see the rules amended to give effect to Policy 6-15 (HRC) I have asked for Jon to reply to this query and we will get back to you in due course about it.

8. Bridges

Allowance for temporary bridges		
Rule 16-12	NZDF request	<ul style="list-style-type: none"> New rule should be added providing for the erection, use and removal of temporary bridges for military training
	HRC response	<ul style="list-style-type: none"> Bridges that do not have a foot in the riverbed are good – if not currently allowed by rules, will consider making an exception. We believe that the rules currently do provide for temporary bridges that do not have a foot in the bed so the below is not necessary.
	Action	<ul style="list-style-type: none"> NZDF to review rule and make suggestions to HRC for alterations needed.
	NZDF Response	<ul style="list-style-type: none"> See proposed rule below

Rules – Other Structures

16-??

Temporary Bridging

The erection, reconstruction, placement, alteration, use and demolition or removal of

temporary bridging in, on or over the bed of a river or lake pursuant to s 13(1) RMA, and any associated:

- (a) disturbance of the river bed pursuant to s 13(1) RMA,
- (b) discharge of water or sediment pursuant to s 15(1) RMA.

Is **Permitted** subject to the following conditions:

- (a) The Temporary Bridging and any associated support structures shall either:
 - (i) be wholly located over the bed of the waterbody, or
 - (ii) occupy no more than 20 m² of the bed of the waterbody.
- (b) The Temporary Bridging and any associated support structures shall be removed within 3 months of completion of construction
- (c) The activity shall not take place in a Natural State* waterbody.
- (d) The activity shall comply with the standard conditions listed in Section 16.2.