

# Recommendations for content of submission

(Source: Environmental Defence Society Resource Management Act website  
[www.rmaguide.org.nz](http://www.rmaguide.org.nz))

## Preparing Submissions on Resource Consent Applications

### Content of submission

There are six elements which you will need to address in the submission. To read these [click here](#)

#### **This is a submission on an application from [name of applicant] for a resource consent:**

Insert the name of the applicant, type of resource consent applied for (land use consent, water permit) the activity which is proposed (constructing a house, subdividing a property) and the location of the proposal.

#### **The specific parts of the application that my submission relates to are:**

Clearly indicate which parts of the application you are concerned with. If you are concerned with the whole application you can state 'the application in its entirety'. If you are concerned with only part, describe that part, for instance 'that part of the application which relates to vegetation clearance.'

#### **My submission is:**

State whether you support or oppose the whole or specific parts of the application as identified above or are neutral regarding the application or specific parts of it.

1. If you support or oppose the whole application state this, for instance, 'I support the application in its entirety' or 'I oppose the application in its entirety'.
2. If you support or oppose part of the application clearly specify which part, for instance, 'I oppose the part of the application which seeks consent to discharge storm water into the Kaituna River.'

You then need to clearly set out the reasons for your support or opposition to the proposal or your neutral stance. The reasons need to relate to environmental matters and not to other objections you may have to the proposal, such as trade competition, the financial viability of the proposal or the bona fides of the applicant or consent authority. In stating the reasons for your submission you should give consideration to the following:

- Are there any negative effects that the proposal will have on you and any implications flowing from this, such as your ability to occupy and enjoy your property?

- If there are likely to be significant adverse effects, has there been adequate consideration of alternatives?
- Are adequate actions proposed to avoid, remedy or mitigate the effects?
- Is the application consistent with [Part II](#) of the RMA including the overarching purpose of sustainable management (section 5), the matters of national importance (section 6) and other matters (section 7)?
- Is the application consistent with the [New Zealand Coastal Policy Statement](#) or any other national policy statement in force?
- Is the application consistent with any relevant [regional policy statement](#) and/or [regional plans](#)? Such plans are relevant if they cover the same geographical area and address the same broad issue.

Is the application consistent with the [district plan](#)?

If the application is for a non-complying activity:

- Are the adverse effects on the environment more than minor? 'Minor' means that the effects are comparatively small in size and importance, although they can be more than minimal.
- Is the proposed activity contrary to the objectives and policies of the relevant plan and proposed plan?

You may wish to briefly refer to any information you have on the current environment and the impacts on this of the proposed activity. For example, there may be important habitats or landscapes which will be negatively impacted on. It is good practice to keep submissions concise and accurate leaving detailed issues to be addressed during evidence presentation at the hearing.

**I seek the following decision from the consent authority:**

Be as precise as possible about what decision you would like the consent authority to make, including the parts of the application you wish to have amended, for example:

- 'Approve the application.'
- 'Decline the application in its entirety.'
- 'Only approve the application if a condition is imposed to the effect that no storm water is discharged from the site.'
- 'Only approve the application if the following condition is imposed: 'All storm water shall be treated and disposed of within the boundaries of the site' or wording to like effect.'

### **I wish (or do not wish) to be heard in support of my submission**

State whether or not you would like to go to the hearing of the resource consent application to present your submissions in person. If you are raising more than minor issues, you should consider attending the hearing to present them in person. The hearing committee is likely to give greater weight to submissions when members have the opportunity of hearing from the submitter and asking any questions that they have in relation to the submission. Stating that you wish to be heard at the submission stage does not obligate you to appear at the hearing later if you change your mind. Therefore there is little to be gained by stating you do not wish to be heard. Also, if you state you do not wish to be heard, the council is not obliged to advise you of the hearing.

### **If others make a similar submission I will consider presenting a joint case with them at a hearing**

You will gain points with the Council if you indicate a willingness to collaborate with other submitters raising a similar point. This will reduce potential repetition and the length of the hearing.