



Submission on proposed Regional Policy Statement for the Wellington region, 2009

Pursuant to Clause 6 of the first Schedule and Section 79 of the Resource Management Act 1991

Submission can be:

Posted to: Freepost 118112
Proposed Regional Policy Statement
Greater Wellington Regional Council
PO Box 11646
Wellington 6142

Delivered to: Ground Floor Reception, 142 Wakefield Street, Wellington

Faxed to: 04 385 6960

E-mailed to: rps@gw.govt.nz

Submissions need to be received by 25 May 2009 at 4pm

Your name and contact details:

Full name: Adrienne STAPLES, Mayor, South Wairarapa District Council
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MARTIN BOROUGH

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Contact person:

Address and telephone no.....
(if different from above)

Submission

1. The specific parts of the proposed Regional Policy Statement that my submission relates to are as follows:

SEE ATTACHED
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.....

(Clearly indicate which parts of the document you support or oppose, or wish to have amendments made to. Please continue on separate sheet(s), if necessary)



File:

If calling ask for:

19 KITCHENER STREET
MARTINBOROUGH 5711

South Wairarapa District Council's submission on the Greater Wellington Regional Council's Proposed Regional Policy Statement.

General

South Wairarapa District Council is supportive of the general direction of the draft Regional Policy Statement and the more focused approach when compared with the operative Regional Policy Statement. The proposed RPS will provide much more clarity for planners implementing the district plan.

The Council is also supportive of the structure of the draft Regional Policy Statement.

The submitter notes that there are a total of 21 policies in the Proposed Regional Policy Statement that require attention through the District Plan. The South Wairarapa District Council feels the majority are being already being dealt with in their Proposed Wairarapa Combined District Plan to a level that it believes will satisfy the Regional Council.

Chapter 1: Introduction

Page 4, last paragraph: Wellington Regional Council should be referred to as the "Greater Wellington Regional Council".

Page 9, paragraphs 5 & 6: same as the above.

It would be useful to have a list of all the Regional Plans in the Regional Plans section - the Coastal Plan, the Soil Plan, the Freshwater Environment Plan, the Discharge to Land Plan and the Air Quality Plan.

Also in the Section 1.3 (page 4), in "other strategies and companion statutes", mention is made of the Wellington Regional Land Transport Strategy. It states that this WRLTS has "contributed to a number of policies and methods in the RPS". However, further in the document it is clear that the WRLTS must also respond to the RPS. Could the relationship between the RPS and the Wellington Regional Land Transport Strategy be stated more clearly.

This is also referenced in Section 4 page 73, in the first dot point which says that "Section 4.1 contains policies that direct district or regional plans, or the Wellington Regional Land Transport Strategy".

Chapter 3: Issues and objectives

3.1 Air Quality

General comments

Support both Objective 1 & Objective 2

3.2 Coastal environment

General comments

The Council specifically agrees with the concerns raised in the draft Regional Policy Statement regarding the discharge of contaminants affecting the coastal environment.

The influence of fresh water (rivers, streams and drains) on coastal water quality.

The South Wairarapa District Council seeks that the Regional Policy Statement strongly discourages medium/large-scale subdivision in coastal areas.

Objective 4

The South Wairarapa District Council has concerns about ongoing coastal development along the Wairarapa Coast eroding environmental and amenity values and strongly supports Objective 4

Objective 5

This should be amended to clarify that the aim is to target significantly degraded areas or inadvertently degraded' and not to restore instances of degradation that occur as a result of activities that legally occur under RMA consents.

More definition is needed on what "degraded and in need of repair means".

3.3 Energy, infrastructure and waste

General comments

Page 27 Is the second paragraph accurate? What about the Meridien Energy wind turbine behind the Karori Sanctuary, and the wind farm at Makara?

Page 28 first paragraph "... small scale renewal energy generation..." possibly needs to mention individually owned or community owned wind generation.

Infrastructure - as well as mentioning that land development can encroach on infrastructure, the RPS needs to mention that infrastructure expansion should be planned appropriately to allow for development.

Page 29 Infrastructure. The first sentence is obscure.

Suggested wording: *Infrastructure provides communities with essential services therefore should not be compromised by inappropriate land use or development.*

Include comment on the benefits derived from regional cooperation with waste management for example the Waste Minimisation Plan that was implemented by the three Wairarapa Councils.

The South Wairarapa District Council recognises that while renewable energy is to be encouraged where possible, wind turbines do come with some negative impacts.

The Wairarapa is an area that has considerable potential for wind generation. Without appropriate controls the landscape may be considerably degraded. The South Wairarapa District Council states that if wind generation is not managed in a sustainable way both environmentally and socially then it may be contrary to section 5 of the RMA.

Objective 9

Needs an additional clause: (f) *while recognising amenity values, protecting significant landscapes and biodiversity and not adversely affecting local communities.*

3.4 Fresh Water

General comments

Page 34 - needs to recognise that some urban water supplies are supplied by rivers, for example Greytown and indirectly Martinborough.

Page 34 - The linking of poor water quality with farming/agriculture is implied through the document and while agricultural land use has an impact on water quality; it is just one of many factors and needs to be assessed against the economic and community benefit.

Objective 12

Is the only objective that recognises that water is required for the social and economic wellbeing of people and communities.

3.5 Historic Heritage

General comments

SWDC notes that the RPS has carefully balanced the language used in the Resource Management Act with the terminology in the New Zealand Icomos Charter. SWDC supports following the guidance of National documents such as ICOMOS, where this is able to be integrated with the RMA.

3.9 Regional Form, Design and Function

General comments

No mention of the smaller towns, their contribution to the region, requirements for public transport or good urban design albeit in a smaller way. Also see comments on policy 29.

3.10 Resource Management with Tangata Whenua

General comments

Rewording to include Tangata Whenua also working with Councils.

Chapter 4: Policies and methods

General

South Wairarapa District Council feels that in the regulatory policy section 4.1 there should be policies that specifically look at the whole catchment of the Ruamahanga River. Objectives 12, 13, 14 & 8 are all relevant and so are policies 11,12,13,14 15, 18, 39, 41, 43. We would like some assurance that the whole river situation is addressed. The process of allocating and monitoring groundwater needs to be strong so that consents can be changed or stopped quickly and easily.

Policy 6

(a)(iv) "access to telecommunication services" – needs '*where available*' added.

Also the description "imported energy sources" is perhaps incorrect because much of the natural gas and coal used comes from NZ. Perhaps "*carbon based energy source*" is a more accurate description?

Policy 8

SWDC does not support the statement that "Carbon dioxide is a greenhouse gas that contributes to climate change".

There is considerable scientific evidence available which has a contrary view to this statement. Carbon dioxide is also a gas which is essential to life and the growth of plants. The focus should be on fuel efficiency and the use of sustainable energy so we have resources for the future rather than focusing on science that is still under debate. We suggest rewording the statement to '*Carbon dioxide is a greenhouse gas that may contribute to climate change*'.

Policy 13

Consider that the paragraph should be headed "*Minimising contamination in stormwater from new development and upgrades to existing development*"

Policy 15

Promoting discharge to land – change clause (b) to include the wording in italics "promote the use of collective sewerage treatment systems *where feasible*."

Policy 20

The criteria for identifying a Places, Sites or Areas with Historic Heritage values are listed in Policy 20. It would be useful to insert in the 'explanation' how these criteria have been established.

Policy 22

The criteria for identifying indigenous ecosystems and habitats with significant biodiversity values are listed in Policy 22. It would be useful to insert in the 'explanation' how these criteria have been established.

Policy 24

The criteria for identifying outstanding natural features and landscapes are listed in Policy 24. It would be useful to insert in the 'explanation' how these criteria have been established.

Policy 26

The criteria for identifying significant amenity landscape values are listed in Policy 26. It would be useful to insert in the 'explanation' how these criteria have been established. Note: The Proposed Wairarapa District Plan has a Schedule of Significant Natural Areas. These are not the same thing.

Also SWDC would suggest the word 'values' be deleted. We are identifying the landscapes not the criteria, which are the values listed in the policy. I note that there is a definition of significant amenity landscapes (Appendix 3 page 169). The criteria mentioned in the definition are supposedly the criteria in Policy 26. It would be useful to have the cross reference.

Policy 29

SWDC is already implementing this policy through the proposed Wairarapa Combined District Plan and the design guidelines for all three of its town centres. SWDC feels that its exclusion from this policy is not justified. More people come to the Wairarapa to visit the towns in the South Wairarapa than they do to visit Masterton.

Policy 53

Urban Design has been referenced in Policy 53, Appendix 2 and the definitions in Appendix 3. It would be useful to make brief mention of the 'seven C's' in the definition on page 167 (New Zealand Urban Design Protocol).

Appendices**Appendix 1**

The Tauherenikau River should be included as recreationally significant. The upper area, accessed from Bucks Road, is used for swimming and rafting by significant numbers of people in the summer.