

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

To: Freepost 118112
Proposed Regional Policy Statement
Greater Wellington Regional Council
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Name of Submitter: Wellington Police
Wellington Metro District
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(Note: Different address for service)

1. This is a submission on the Proposed Regional Policy Statement for Wellington Region, 2009:

- 1.1. Pursuant to Clause 6 of the first Schedule of the Resource Management Act 1991 (RMA), Wellington Police hereby lodges a submission on the Proposed Regional Policy Statement for Wellington Region, 2009 (RPS). Under the RMA Regional Councils are required to review their regional policy statements every 10 years. The Proposed RPS is the second Regional Policy Statement to be prepared by the Greater Wellington Regional Council (GW).

2. The specific provisions of the Proposed RPS that this submission related to are:

- 2.1. Provisions in the Proposed RPS relating to social infrastructure and essential social services, urban centres, regional form, and rural areas

3. Introduction:

- 3.1. Wellington Police's Mission Statement is to serve the community by reducing incidence and effects of crime, detecting and apprehending offenders, maintaining law and order, and enhancing public safety.
- 3.2. Wellington Police is interested in controls or policies, or proposed developments that affect any land near existing or proposed police stations or other known Police property.
- 3.3. Wellington Police is also interested in policies that affect social behaviour and the avoidance/mitigation of natural hazards.

4. Summary of issues:

- 4.1. Wellington Police is concerned that no recognition or specific reference is made in the objectives or policies of the Proposed RPS to social infrastructure or essential social services, specifically including emergency services, such as those provided by Wellington Police.
- 4.2. Wellington Police is particularly concerned about:
 - Incorporating definitions and references to social infrastructure and essential social services, including emergency services;
 - Providing for the development of social infrastructure and essential social services in urban areas and centres of regional significance;
 - Ensuring structure plans consider social infrastructure and essential social services; and
 - Providing for the development of social infrastructure and essential social services in rural areas when needed.
- 4.3. Wellington Police consider that it is a matter of public interest that Council demonstrates commitment to providing for social infrastructure and essential social services, including emergency services.

5. Wellington Police submit on the following specific matters:

Social infrastructure and essential social services:

- 5.1. Wellington Police notes that concepts such as social infrastructure and essential social services, including emergency services, are not considered in the Proposed RPS. Although Wellington Police interests are likely to be encompassed under generic terms such as 'access to civic services', this is not specific enough to provide policy guidance for Wellington Police interests when implementing District Plans.
- 5.2. Wellington Police requests that the concepts of social infrastructure and essential social services, including emergency services, are incorporated into the Proposed RPS and adequately defined.

Relief sought:

- 5.3. That the terms 'social infrastructure' and 'essential social services', including references to emergency services, or similar terminology, are defined in the Proposed RPS and are explicitly referenced where possible within descriptive, issues, or explanatory statements throughout the relevant parts of the Proposed RPS and are incorporated into the objectives and policies of the Proposed RPS.

Urban centres:

- 5.4. Wellington Police notes the Objective and Policies directly related to development within urban centres:

Objective 21: A compact well designed and sustainable regional form that has an integrated, safe and responsive transport network and:

(a) a viable and vibrant regional central business district in Wellington city;

- (b) an increased range and diversity of activities in and around the regionally significant centres;*
- (c) sufficient industrial-based employment locations or capacity to meet the region's needs;*
- (d) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form;*
- (e) strategically planned rural development;*
- (f) a range of housing (including affordable housing);*
- (g) integrated public open spaces;*
- (h) integrated land use and transportation;*
- (i) improved east-west transport linkages; and*
- (j) efficient use of existing infrastructure (including transport network infrastructure).*

Policy 29: Maintaining and enhancing the viability and vibrancy of regional significant centres – district plans

District plans shall include policies, rules and/or methods that encourage a range of land use activities that maintain and enhance the viability and vibrancy of the regional central business district in Wellington city and the following centres of regional significance:

- (a) Upper Hutt city centre;*
- (b) Lower Hutt city centre;*
- (c) Porirua city centre;*
- (d) Paraparaumu town centre;*
- (e) Masterton town centre;*
- (f) Petone;*
- (g) Kilbirnie; and*
- (h) Johnsonville.*

Policy 30: Identifying and promoting higher density and mixed use development – district plans

District plans shall:

- (a) identify key centres suitable for higher density and/or mixed use development;*
- (b) identify locations, with good access to the strategic public transport network, suitable for higher density and/or mixed use development; and*
- (c) include policies, rules and/or methods that encourage higher density and/or mixed use development in and around these centres and locations,*

so as to maintain and enhance a compact, well designed and sustainable regional form.

- 5.5. Objective 21(b)(d)-(f), is supported by Policies 29 and 30. Policy 29 will require councils to consider the range of land uses that should be encouraged or facilitated in centres of regional significance.

- 5.6. Wellington Police provide an essential social service through the provision of police stations and services etc. However, it is possible that these uses can be relegated to the outskirts of urban areas away from other services and public transport. It is important that there is a mix of uses in the centres of regional significance including essential social and emergency services.
- 5.7. Policy 30 also implements Objective 21. It promotes higher density and mixed use development in urban centres across the Greater Wellington region.
- 5.8. This can potentially result in positive benefits for Wellington Police as it will help ensure that urban areas have a mix of uses, including social infrastructure and essential social services, such as those provided by Wellington Police. In addition, higher density urban areas will help ensure that Wellington Police stations and facilities are close to other services and public transport.

Relief sought:

- 5.9. That Objective 21 be retained in part but amended to include:
(k) provides for social infrastructure and essential social services, including emergency services.
- 5.10. That Policy 29 be retained in part but amended to read:
*District plans shall include policies, rules and/or methods that encourage a range of land use activities **and social infrastructure** that maintain and enhance the viability and vibrancy of the regional central business district in Wellington city and the following centres of regional significance:*
- 5.11. That Policy 30 be retained in part but amended to include:
(d) includes polices, rules and/or methods that support locating social infrastructure and essential social services in areas of high density and mixed development.

Regional form:

- 5.12. Wellington Police notes the Policy directly related to regional form:
Policy 54: Maintaining a compact, well designed and sustainable regional form – consideration.
When considering an application for resource consent, or a change, variation or replacement to a district plan for urban development beyond the region's urban areas (as at March 2009), particular regard shall be given to whether:
- (a) the proposed development is the most appropriate option to achieve Objective 21;*
(b) the proposed development is consistent with the Council's growth and/or development framework or strategy that describes where and how future urban development should occur in that district; and/or
(c) a structure plan has been prepared.
- 5.13. Policy 54 requires that structure plans are prepared for urban development beyond the existing urban areas.
- 5.14. It is possible that Wellington Police may need to locate services outside existing urban areas or in new emerging areas. Structure planning should give regard to, and

consideration of, social infrastructure and essential social services, including emergency services.

Relief sought:

5.15. That Policy 54 be retained in part but amended to include:

*(c) a structure plan has been prepared **that incorporates social infrastructure and essential social services, including emergency services, as necessary.***

Rural areas:

5.16. Wellington Police notes the Policy directly related to development in rural areas:

Policy 55: Managing development in rural areas – consideration.

When considering an application for a resource consent or a change, variation or replacement to a district plan, in rural areas (as at March 2009), particular regard shall be given to whether:

- (a) the proposal will result in a loss of productivity of the rural area, including cumulative impacts that would reduce the potential for food and other primary production;*
- (b) the proposal will reduce aesthetic and open space values in rural areas between and around settlements;*
- (c) the proposal's location, design or density will minimise demand for non-renewable energy resources; and*
- (d) the proposal is consistent with the relevant city or district council growth and/or development framework or strategy that addresses future rural development; or*
- (e) in the absence of such a framework or strategy, the proposal will not increase pressure for public services and infrastructure beyond existing infrastructure capacity.*

5.17. Policy 55 places restrictions on development in rural areas.

5.18. Social infrastructure and essential social services, including emergency services, such as those provided by Wellington Police, are required throughout the Greater Wellington region. Although primarily located in urban centres there may be a need for facilities to be located outside the urban footprint.

Relief sought:

5.19. That Policy 55 be retained in part but amended to read:

Policy 55: Managing development in rural areas – consideration.

When considering an application for a resource consent or a change, variation or replacement to a district plan, in rural areas (as at March 2009), particular regard shall be given to whether:

- (a) the proposal will result in a loss of productivity of the rural area, including cumulative impacts that would reduce the potential for food and other primary production;*
- (b) the proposal will reduce aesthetic and open space values in rural areas between and around settlements;*

- (c) the proposal's location, design or density will minimise demand for non-renewable energy resources;*
- (d) the proposal is for social infrastructure or essential social services, including emergency services, that will benefit the Greater Wellington community; and***
- (e) the proposal is consistent with the relevant city or district council growth and/or development framework or strategy that addresses future rural development; or*
- (f) in the absence of such a framework or strategy, the proposal will not increase pressure for public services and infrastructure beyond existing infrastructure capacity.*

6. Conclusion:

- 6.1. In conclusion Wellington Police submits that:
 - a) Wellington Police provide social infrastructure and essential social services, including emergency services, that benefit the Greater Wellington Community;
 - b) It is a matter of public interest that Council demonstrates commitment to providing for social infrastructure and essential social services, including emergency services; and
 - c) The relief sought by Wellington Police is reasonably necessary in order to ensure provision is made in the Proposed RPS for social infrastructure and essential social services, including emergency services.
- 6.2. Wellington Police seek that the Proposed RPS be amended to include the matters outlined in the relief sought sections in the above submission.
- 6.3. Wellington Police do not wish to be heard in support of this submission.

Supt. Hamish McCardle
Acting District Commander
Wellington District

Signed

5 June 2009

Dated

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