

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

Name of submitter

Friends of Owhiro Stream

c/- Paul Blaschke
34 Pearce St
Vogeltown
Wellington 6021

Contact details:

Dr Paul Blaschke

Environmental and ecological consultant, Blaschke & Rutherford
34 Pearce St, Vogeltown, Wellington 6021
Tel/fax (04) 3898 545; Mob (027) 246 2848
Email: paul.blaschke@xtra.co.nz

Our submission

1. Which parts of the proposed RPS does this submission relate to?

Objectives and policies and methods related to freshwater and indigenous biodiversity.

2. Our submission

We generally support the objectives and policies in the proposed RPS.

We agree with issues identified for freshwater and indigenous biodiversity and we generally agree with policies on the objectives for freshwater and indigenous biodiversity (11-19, 22-23, 39-44, 46, 64-65).

These objectives are often seen to be balanced against the region's requirement to develop and provide for a growing population. In our view, providing for people does not need to be in opposition to the natural environment. With informed planning and innovative design the natural and urban environments can intermingle, benefiting the health and wellbeing of both. The monetary cost of this approach may be greater in the short term but the long term sustainability of the Wellington region depends on its ability to adapt to the financial and environmental conditions it is facing.

Friends of Owhiro Stream's observation is that the current stormwater system design in Wellington City is compromising stream environments. We have submitted to planning processes that Wellington City should have *a goal of no increase in stormwater flows from consented activities*. We have also submitted repeatedly for a cumulative and integrated view to be taken towards planning in the Owhiro Stream and other city catchments. Our suggestions for amendment of the proposed RPS are made in this light.

We specifically support the methods to provide information to assist with restoration and enhancement of freshwater and indigenous biodiversity, as well as other environmental issues, such as Methods 8, 11, 12, 20, 21 etc. We draw attention to these methods because we have seen how important Owhiro Stream has become for its social and amenity values, as much as for its ecological values. It has become a valuable educational resource for Wellington's southern suburbs, and this in turn reinforces its natural values as people in the community become aware of the stream and want to protect it. Information resources are crucial to support this education and awareness cycle and this is a legitimate important role for councils.

3. Specific decisions sought:

- 3.1 We particularly support Policy 41 with the aim of hydraulic neutrality. However, we think that this aim should be specifically incorporated into the criteria for policy 41; for example by adding a criterion similar to (a); viz:
 - "Limiting the total amount and intensity of stormwater runoff in the stormwater catchment"
- 3.2 We also particularly support policy 64 regarding a whole of catchment approach. However we think that some of the intent of policy 64 needs to be brought into policies relating to district and regional plans and consideration of resource consent application and other statutory processes. This has been attempted by some policies. However it has not been sufficiently brought into policy 41 and this is a further reason for our suggested additional criterion.
- 3.3 We support Policy 17 in part in that it offers good protection to significant rivers and lakes as identified in Appendix 1. We strongly support the inclusion of Owhiro Stream, along with comparable streams in the region (including urban streams). This endorses the significance we attach to the stream and the fact that the Owhiro Stream, although currently degraded in some respects, is the only natural stream flowing to urban Wellington's south coast and the Taputeranga Marine Reserve.
- 3.4 We note that some of the identified streams are insufficiently or wrongly identified. We know of no map or reference for Owhiro Stream to be named as Owhiro Bay Stream. Conversely we suspect that "Little Waitangi Stream" refers to a minor stream (unnamed on topo maps) in the Pauatahanui catchment, but we in FOOS know the Waitangi Stream as one flowing under the Wellington CBD. All rivers and lakes identified in Appendix 1 (Tables 15 and 16) must be identified with a map grid reference at their outflow point.
- 3.5 Policy 17 is deficient in that it only recognises the natural values of the identified lakes and rivers. Some of the significant indigenous ecosystem values associated with the identified rivers and lakes will undoubtedly be associated with other rivers and lakes which are currently insufficiently well known or are otherwise not meeting the criteria associated with Table 16. For example, we are finding

small urban streams in Wellington that offer habitat to native fish species, even though, overall, they do not meet the criteria for significance in Table 16 and would be unlikely to. Both objectives and policies should be focussed on recognition and protection of the **values**; this will help to prevent arguments over the ecological significance of specific areas.

Accordingly, Policy 17 should be amended to:

“Regional plans shall include policies and rules that protect:

(a) ~~significant amenity and recreational values, including those~~ associated with the rivers and lakes listed in Appendix 1; and

Deleted: the

(b) ~~significant indigenous ecosystem values, including those~~ associated with the rivers and lakes listed in Appendix 1.”

Deleted: the

Deleted: s

This wording would be consistent with the title for Policy 17, which we agree with.

3.6 Policy 14: As the policy relates to silt and sediment (not just silt), the explanation should be consistent. The words “and sediment” should be added after “silt” in the fourth line of the explanation for policy 14 (p 88).

3.7 Policy 13 should make explicit the impact of flow quantity on the effects of contaminants in stormwater (i.e. a more explicit link between policies 13 and 16). This could be achieved by the following wording:

“Regional plans shall include policies, methods and/or rules that protect aquatic ecosystem health by minimising **additional stormwater flow, and** ecotoxic and other...., from new subdivision and development”.

We wish to be heard in support of our submission

If others make a similar submission, we will consider presenting a joint case with them at a hearing.

Signed



Dr Paul Blaschke

Environmental and ecological consultant, Blaschke & Rutherford

34 Pearce St, Vogeltown, Wellington 6021

Tel/fax (04) 3898 545; Mob (027) 246 2848

Email: paul.blaschke@xtra.co.nz

8 June 2009