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Proposed Regional Policy Statement  
Greater Wellington Regional Council  
PO Box 11646  
Wellington 6142

To whom it may concern,

**SUBMISSION on the PROPOSED REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION (RPS) 2009**

**RE: POLICIES 24 AND 26**

My submission relates to Policy 24, "Identifying outstanding natural features and landscapes – district and regional plans" and Policy 26: "Identifying significant amenity landscape values – district and regional plans".

I should begin by explaining that I am a landscape architect and an Associate Member of the New Zealand Institute of Landscape Architects (NZILA). I assisted Greater Wellington with preparing the landscape chapter and related provisions for the Draft RPS 2008 and the Proposed RPS 2009.

**1. Landscape Planning Initiative**

The main purpose of my submission is to draw the council's attention to a national 'Landscape Planning Initiative' that the NZILA Education Foundation began in 2008. The purpose of the initiative is to develop a 'best practice' for landscape planning that covers:

- landscape terms and definitions;
- landscape assessment procedures and practice;
- guidelines for the use of visual aids in presenting landscape assessment findings.

Most of the senior landscape architect/ landscape planning practitioners from around the country attended workshops in 2008 and/or have collectively been contributing to the development of the best practice document. Judges and Commissioners from the Environment Court also attended the first of the workshops and the Court has also been invited to comment on draft material as it is prepared.

The Initiative was in its early stages at the time that the Proposed RPS was being finalised, so could not be taken into account at that stage, but the Initiative offers an opportunity to ensure the RPS landscape provisions are aligned with commonly accepted landscape assessment best practice.

Although it is not yet complete and the draft material not yet been ratified, nevertheless, the work carried out so far on the Initiative is the result of collective input from the country's most experienced landscape planning practitioners. Therefore, I would like to suggest that Greater Wellington consider its proposed landscape provisions in the light of the outcomes so far available from the Landscape Planning Initiative. Specific comments about policies 24 and 26 follow.

## **2. Policy 24**

### ***Criteria***

The assessment criteria specified in this policy are based on what is known as the "Pigeon Bay criteria", which have been widely recognised in the landscape profession as a sound basis for landscape assessment. Although the word 'criteria' has been widely used up until now, the Landscape Planning Initiative has sparked discussion within the landscape profession as to whether the Pigeon Bay factors are really more a list of landscape attributes (that need to be taken into account in describing and assessing landscapes) rather than 'criteria' (which should set a measure or a threshold).

In the context of Policy 24, this would mean that:

- the list (a) – (g) would be the minimum set of factors that should be considered in a landscape assessment process, and
- the measure or threshold of 'outstanding' would be that the natural feature or landscape would have to be "exceptional or out of the ordinary" and that the natural components would have to "dominate over the influence of human activity."

### ***Application of criteria***

There is another point about the current wording which arose recently in discussion with landscape colleagues. At the moment, a natural feature or landscape could be deemed 'outstanding' if natural components 'dominated over the influence of human activity' and *just one* of the listed criteria was assessed as being 'exceptional or out of the ordinary'. This does not adequately capture the widely recognised concept that 'landscape' is really about the sum of the parts – an integrated whole. The 'one or more' standard in the policy was, I recollect, specified to make clear that the outstanding threshold did not necessarily have to be met under all the criteria; however, on reflection, I believe it may set the threshold too low by allowing just one of the listed criteria to be outstanding.

### ***Grammatical error***

The first paragraph to Policy 24 doesn't make grammatical sense. The current wording suggests that there will be an identification and a determination and then some undefined action. (i.e. that the plans "...shall identify ... , and having determined..." - what?) I believe the word 'and' is superfluous and the sentence was probably intended to read:

*"District and regional plans shall identify outstanding natural features and landscapes using the following criteria, and—having determined that the natural feature or landscape is exceptional or out of the ordinary under one or more of the criteria and the natural components dominate over the influence of human activity."*

**Suggested remedy**

I suggest rewording the first paragraph of Policy 24 to address the points above something like:

*"District and regional plans shall identify outstanding natural features and landscapes ~~using the following criteria, and having determined that~~ **each identified** natural feature or landscape is exceptional or out of the ordinary ~~under one or more of the criteria~~ and the natural components dominate over the influence of human activity, **taking into account the following matters and their characteristic combination within the natural feature or landscape:...**"*

This wording retains the 'outstanding' and 'natural' thresholds but widens the scope to better encapsulate the concept of integrated landscape values.

Although the explanation on page 94 clarifies that all the listed factors must be assessed, it would be better to make this explicit in the policy wording itself. Obviously, if the policy were to be reworded, so would the explanation correspondingly.

**3. Policy 26**

My earlier comments about criteria, thresholds and grammar apply to this policy also, but in relation to identifying 'important' landscape values.

**Suggested remedy**

I suggest rewording of the first paragraph of Policy 26 to address the points above something like:

*"District and regional plans shall identify significant amenity landscapes, ~~using the following criteria, and having determined~~ **that each identified** the landscape has important landscape value, **taking into account the following matters and their characteristic combination within the landscape:...**"*

Thank you for your consideration.

Yours sincerely,



Shona McCahon