

Proposed Natural Resources Plan:

Submitter:

**Mt Victoria Residents' Association Inc
(MVRA)**

Submitter Number:

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Submission on Proposed Natural Resources Plan for the Wellington Region

The Mt Victoria Residents' Association Inc (MVRA) submits the following on the Wellington Regional Council's Proposed Natural Resources Plan which replaces five existing plans for the coast, air quality, freshwater, and discharges to land and soil. Our comments relate mostly to aspects of the Proposed Plan which affect Wellington City, but within the context of the wider region and country.

We would like to be heard in support of our submission at hearings.

General comments

1. We agree with combining separate plans as an integrated approach to the sustainable management of natural resources to protect our environment for future generations is required. This approach reflects that of the Regional Policy Statement. We are also pleased to see the Proposed Plan has been developed in partnership with iwi and that it reflects the guiding principles from this partnership.
2. We note the Wellington Regional Council (WRC) is establishing whitua committees in the five major catchments of the region. However, we are surprised to see they will decide only on how water quality will be managed in their catchments. This seems not to reflect the integrated approach proposed. We would like to see whitua committees involved in all aspects of natural resources management. We also recommend that they be democratically elected as they seem to be the proxy for community involvement.
3. As the Regional Policy Statement already contains the objectives and policies spanning all the natural and physical resources to be managed sustainably, we question why the Proposed Plan also contains objectives and policies, but organised and stated differently. This is confusing as the Regional Policy Statement, being a statutory document, has precedence over the Proposed Plan. Ideally, the Proposed Plan should merely repeat the Regional Policy Statement's

objectives and policies and then set out the more detailed elements contained in the Rules and management processes (including the principles and whitua processes).

4. More confusing, particularly for the people who must comply with the plans, is the apparent need for even more planning documents, for example, we note in 6.1.4 *“Wellington Regional Council will develop an integrated strategy for the implementation of all matters under the National Policy Statement for Freshwater Management (2014) by December 2015”*.
5. In addition, whereas the Regional Policy Statement contains tables showing clear links from each objective to its related policies and methods, the Proposed Plan is likely to be difficult for those who must comply with it to navigate as it does not show the links between its objectives, policies and rules. For example, there are two objectives stated under a heading “water quality”, but the related policies and rules are not organised under the same heading. We suggest the Proposed Plan have tables similar to those in the Regional Policy Statement so that is it easy to follow.

Major elements missing from the Proposed Plan

6. The Regional Policy Statement calls for integrated planning *“particularly in relation to transport which has such a major impact on land use and on the land itself”*, with two major aspects of natural resources management -climate change causes and transport matters -clearly integrated throughout much of its issues, objectives and policies. However, the Proposed Plan does not include any provisions to address these aspects; it addresses only the adverse consequences. We note the reason for transport’s exclusion may be because it is covered by the Regional Land Transport Plan. Whatever the reason, the result is the Proposed Plan does not reflect all elements of the Regional Policy Statement, and does not meet its integrated planning requirements.
7. One absurd effect of this is illustrated by Policies P92 and P93. These cover avoiding adverse effects of discharges from hydraulic fracturing, but not the adverse effects of the hydrocarbons extracted.
8. We strongly urge that the Proposed Plan include rules and methods covering climate change causes and transport-related matters. They can be repeated and cross-referenced from the Regional Land Transport Plan if necessary.
9. To provide more specific detail, we note that the Regional Policy Statement contains many elements to address climate change causes and transport matters, including reduction of greenhouse gas emissions (GHGs), efficient development and use of infrastructure, better-designed regional form, and better use of renewable and existing energy resources, through energy conservation and efficiency. Policies include:
 - a. promoting efficient use and conservation of resources
 - b. recognising the benefits from renewable energy and regionally significant infrastructure, for example from security of supply and diversification of our energy sources, reducing dependency on imported energy resources, and reducing greenhouse gas emission
 - c. reducing the use and consumption of non-renewable transport fuels and carbon dioxide emissions from transportation
 - d. promoting travel demand management
 - e. promoting energy efficient design and small scale renewable energy generation
 - f. maintaining a compact, well designed and sustainable regional form
 - g. integrating land use and transportation

h. co-ordinating land use with development and operation of infrastructure.

10. Unfortunately, most of these policies are absent from, or only partially contained in, the Proposed Plan, and so do not flow through to the Rules. For example, Policy P12 states “*The benefits of regionally significant infrastructure and renewable electricity generation facilities are recognised by having regard to a) the strategic integration of infrastructure and land use...*”, but otherwise lists only the location of existing infrastructure, structures, renewable electricity activities, and some operational requirements.
11. In addition, even the policies that are included in the Proposed Plan do not appear to flow through to Rules. For example Policy P12 requires having regard to the integration of infrastructure and land use, but the Land Use Rules (R94-R103) are silent on this requirement. The result is the Regional Policy Statement policies lettered f. to h. above are absent, as are its other policies on land use and the importance of access to public transport.

Air quality

12. We are pleased to see a general statement in Objective O39 and Policy P52 that ambient air quality is maintained or improved to acceptable standard. Other air quality objectives and policies more specifically focus on odour, smoke, dust and fumes from many sources. However, neither they nor the related Rules include anything specific regarding transport-related pollutants. This is a major omission given that the WRC’s Air Quality Management Plan 2000 states that motor vehicles are the most significant source of air pollution from mobile sources, and discharges from aircraft can have significant localised effects.
13. We also note that the Regional Policy Statement includes transport matters regarding energy use, and land use, but not air quality. This may be because of the view (see section 3.1) that discharges from motor vehicles are not at adverse levels for people’s health. However, our view is that this results from discharge measurements being averaged across the whole region, and also because of the very limited number of GWC monitoring stations – there is only one in the whole of Wellington city. In addition, the city monitoring station is not monitoring PM^{2.5} despite the fact the WHO, US EPA and EU have all adopted standards for it because it is now widely recognised that the adverse health effects associated with exposure to PM^{2.5} are greater than those associated with PM¹⁰. Fine particles can remain suspended for a long time and travel far and cause most health damage because they penetrate deeper into lungs than coarser particles ie. PM¹⁰. Fine and ultrafine particles can also travel from our nostrils along neural pathways directly into our brains, provoking or accelerating dementia diseases. Residential exposure to air toxins is also linked to lower grades among school children.
14. Details on Wellington city in a 2012 report on air quality in the region (*Air quality in the Wellington region: State and trends*, T Mitchell, Environmental Monitoring and Investigations Department) states the New Zealand Transport Authority has shown that nitrogen dioxide concentrations may be elevated on some heavily trafficked local roads which are surrounded by buildings that interfere with the dispersal of pollutants. In addition, there may be potential impact on air quality in areas adjacent to the Port of Wellington as a result of sulphur dioxide emissions from shipping activities in Wellington Harbour.
15. In Mt Victoria, some concerned residents and staff at the Wellington East Girls College want air quality monitoring stations near the exhaust fan from the Mt Victoria tunnel, and near bus stops and roads at the Basin Reserve. There are health concerns over inhalation of particulate matter from diesel powered and other vehicles. Similarly, of great concern to the Association is the concentration of diesel exhaust near bus stops during peak hours.

16. The increasing use of solid fuel burners in recent years has also adversely affected the city's air quality. The very permissive rules regarding domestic heating will not maintain or improve city air quality. It is also difficult to see how air emissions can be confined within a property boundary. Tighter rules regarding domestic heating are required.
17. Clearly, better information on air quality is needed around Wellington city. We recommend the installation of air quality monitors near the Mt Victoria tunnel exhaust fan, and in the inner city at bus stops and high-volume roads. Nanotechnology has significantly reduced the cost of air quality monitoring devices. By having display panels on the monitors, the travelling public can be more informed on the long-term cumulative health impacts they are being subjected to.
18. We also recommend the following changes to the Policies and Rules:
 - Policies P52 to P60 (ambient air quality). We recommend all these policies refer to amenity as amenity is particularly of concern in urban areas such as Wellington city where homes are close together, and they and footpaths are co-located with sources of discharge.
 - Rule R14 (spray coating). As this relates to a permitted activity, the conditions should be more stringent where the business is located in or next to a residential area, such as Mt Victoria. All vents should also be 3m above the roofs of any residential buildings within a radius of 50m of the vents (as is the case in Rule R7).
 - Rule R15 (spray coating). As this also relates to a permitted activity, we are concerned it can occur within only 10m of an educational facility or residence – this condition should be increased to 50m.
 - Rule R23 (crematoria). We recommend discharge into air from a crematorium should be prohibited within a residential area, particularly as the odour could be a threat to our mental health, and violate Objective O41.

Water quality, and discharges to land and water

19. We note in the WRC's 2014 Genuine Progress Index report for the Wellington region only 46% of freshwater recreation sites monitored in 2013 were given fair, good or very good grades over the summer bathing months. Coastal/marine monitored recreation sites rated better, but were still only 64% good or very good in the 2013 summer bathing months. Of great concern for us is coastal water quality results for Wellington city show levels in many sites round the harbour and on the south coast that far exceed maximum enterococci standards (see *Coastal water quality and ecology in the Wellington region: State and trends*, June 2012).
20. Moreover, we are dismayed to read (*Dominion Post 26/8/15*) that fewer than 75% of Wellington city's freshwater sites are meeting water quality standards, and the quality has been declining steadily over recent years. It is unacceptable to dismiss these results by saying the affected sites are all urban streams not used for recreational activities. Even if no one is fishing or swimming in them, they need to be pleasant for people who are walking and cycling beside them.
21. Even more concerning is that the freshwater standard was made less stringent in 2013 by raising the upper limit for *E. coli* from the Health Ministry's 260 cfu per 100 millilitres to 1,000 cfu per 100 mls. We urge that the previous standard be reinstated. Even at more than 540 cfu per 100mls, people are exposed to a high risk of infection from immersion in such water.
22. Clearly current rules and standards are insufficiently stringent to ensure improvements in water quality for recreation. They also need to be better enforced.

23. Coastal pollution is largely at the end of an interconnected causal chain from land use and development, through ground water, rivers, streams and lakes, to the sea. In regard to the Wellington city area, we are very concerned to note (see *Coastal water quality and ecology in the Wellington region: State and trends*, June 12) at least two to three times a year wastewater is allowed to bypass treatment and is discharged directly to the coast or streams. This is because WRC has authorized the Wellington City Council to discharge diluted untreated wastewater through selected stormwater outfalls during periods of heavy or sustained rainfall (eg, via the Overseas Passenger Terminal outfall to Wellington Harbour).
24. In addition, WRC has granted a 'global network' resource consent to WCC to discharge stormwater to the coast. Stormwater picks up sediment, rubbish and a variety of other contaminants (eg. heavy metals, hydrocarbons, herbicides, pesticides, nutrients and pathogens), including from vehicle emissions, along its way to the sea.
25. We suggest the Rules:
- include conditions for resource consents for discharges of wastewater and stormwater that set financial penalties where local councils break the rules or exceed contaminant standards
 - require more interventions to increase public awareness about how people's activities are polluting fresh and marine waters (such as the publicity in Porirua regarding car washing)
 - place controls on emissions from vehicles which are also washed into the stormwater.

Land use

26. We believe there should be measures to reduce the amount of rain water that ends up in stormwater systems. We note an apparent increase in recent years in the conversion of public and private areas with porous surfaces, (eg. gardens, grassy areas and lawns, planted banks) into hard-surface expanses. These may require low maintenance, but there is no longer any drainage into the soil but only into stormwater systems after gathering toxins and pollutants from the non-absorbent surfaces. Some also seem to need occasional hosing down (using potable water). Examples are Wellington city public space conversions at the corner of Molesworth and Pipitea Sts, Glover Park, and along Victoria St.
27. Trees and plants in urban areas have positive amenity effects, and in all areas assist with erosion-control and are a source of climate change mitigation. The Rules appear to be silent on land use activities' climate change effects, either positive or negative. A major mitigation source in New Zealand is forestry. However, NZ climate change projections show plantation forestry is expected to temporarily transition from a net carbon dioxide sink to a net source of emissions sometime around 2020, and only reverting to being a net sink in the late 2030s. This is because forests planted in the late 1980s and early 1990s will be harvested for timber production around 2020, as part of the managed forestry cycle. Projections assume that New Zealand's natural forests are in a steady state with respect to carbon dioxide emissions, that is, neither a sink nor a source.
28. We recommend the land use Policies and Rules:
- require redevelopments and new developments of public and private areas to have predominantly porous surfaces so rain water is absorbed into the soil rather than running off hard surfaces into stormwater systems
 - encourage the use of supplementary rainwater tanks and the reduction in hard, non-porous surfaces

- encourage an increase in the planting of appropriately sited trees and plants, especially in our urban areas. We acknowledge the positive work Wellington City Council is doing with community groups to plant more native trees, mainly on the Town Belt
- require compensatory planting where trees are harvested or removed.

Coastal management

29. The inner-city harbour-front is a world-class attraction greatly enjoyed by Wellingtonians and visitors because it is a public and open marine environment, thanks to the efforts of community groups to keep it that way. We are concerned that new structures which privatise the space, have no particular need to be on the waterfront, and no maritime purpose or relevance, continue to be built and proposed. The most recent example is the proposed slab at Site 10 which exceeds height limits set by the Environment Court, is unsympathetic to its maritime setting and could function anywhere in the city.
30. We are pleased to see Objectives O10, and O53 to O56 regarding the need for access to and public open space in the coastal marine area, that any use and development must have a functional or operational need to be on the coast, and new development is of a scale, density and design that is compatible with location in the coastal environment. We however recommend deletion of Objective O57 and Policy 142(b) as they are contrary to Objective O56, and therefore comparison with the Wellington city CBD should not be relevant – the reference point should be the maritime surrounds.
31. MVRA is also pleased to see the Clyde Quay Boat Harbour listed in the Schedule E sites with significant historic heritage values, and so is covered by the heritage structure Rules R168 to R172. We expect the Rules cover both the parts of the Boat Harbour within WRC jurisdiction and those within Wellington City Council jurisdiction. We recommend the description of its significant values in Schedule E1 more specifically mention the seawalls, breakwaters, moorings and boatsheds in the area so it is clear the Rules apply to all parts of this significant heritage site. Details on their significance are noted in a heritage significance assessment prepared by Michael Kelly for WRC in 2000. We also recommend inclusion of a Rule that any proposals to add to, alter, remove or otherwise change any part of the site must be publicly notified.
32. We agree with Policy 145 which requires avoidance of reclamation, drainage or destruction in the coastal marine environment, except where these activities relate to regionally significant infrastructure, and there are no other locations and practicable alternatives for them. However, Rule R214 contravenes the required avoidance by making the activities discretionary, except in sites of significance. This Rule should be more stringent by requiring evidence of why there are not other locations and practicable alternatives.
33. As an example, we urge the WRC to ensure the Rules and conditions are sufficiently stringent to prevent any extension to the Wellington airport runway. An extension would have an irreversible adverse impact on the aquatic and coastal biodiversity, habitats, and ecosystems of the southern coastal marine environment, an area also of great cultural significance for local iwi.

Historical/heritage

34. We note the Regional Policy Statement identifies the significant issue for the region, including iwi, of the loss of heritage values as a result of inappropriate modification, use and destruction of historic heritage. The Statement reflects Resource Management Act provisions regarding

heritage, and includes an objective and policies regarding identifying places, sites and areas of significant historic heritage, protecting them and managing effects on them.

35. Further to the comments above, we welcome Objective O34 and Policies P46 and P47. However, apart from policies regarding Maori values and exercise of kaitiakitanga, most of the historical/heritage policies and rules in the Proposed Plan relate to coastal maritime and freshwater heritage sites and structures. We agree these aspects are very important, but it is of great concern to us that the Proposed Plan does not include provisions for land-based historic heritage areas and sites. We recommend Rules that reflect the broad scope of the Resource Management Act, the Regional Policy Statement, and Objective O34 be added.

