

Draft Natural Resources Plan for the Wellington Region
Greater Wellington Regional Council
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re: Draft Natural Resources Plan for the Wellington Region/
Te Tikanga Taiao o Te Upoko o Te Ika a Maui

Introduction

This submission is from the Architectural Centre, an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design.

In commenting on this Draft Natural Resources Plan, we have restricted ourselves to issues of the built environment specifically, rather than attempting to comment on all aspects of this plan.

The Architectural Centre supports the stated guiding principles of Te Upoko Taiao:

Ki uta ki tai (connectedness) – managing natural and physical resources in a holistic manner, recognising they are interconnected and reliant upon one another.

Wairuatanga (identity) – recognition and respect for mauri and the intrinsic values of natural and physical features, and including the connections between natural processes and human cultures.

Kaitiakitanga (guardianship) – recognition that we all have a part to play as guardians to maintain and enhance our natural and physical resources for current and future generations the understanding that these all have a role as guardians of the natural environment.

Tō mātou whakapono (judgement based on knowledge) – recognition that our actions will be considered and justified by using the best available information and good judgement.

Mahitahi (partnership) – partnership between Wellington Regional Council, mana whenua and the community based on a commitment to active engagement, good faith and a communality (p. 7).

We note however that it is the Rules that are legally binding (p. 14), rather than the principles, objectives or policies and suggest that if the council's aspiration to be true to these principles has integrity that they be explicitly present as Rules.

We support the proposed partnership with mana whenua regarding the aspects of the natural and cultural environment covered in the Draft Natural Resources Plan.

The definition of Regionally significant infrastructure repeats the list of included items listed in the Regional Policy Statement definitions (p. 194) (<http://www.gw.govt.nz/assets/Plans--Publications/Regional-Policy-Statement/RPS-Full-Document.pdf>), and does not provide a generic definition about what determines the significance of this



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regional infrastructure. We recommend replacing this list with a definition which makes apparent the quality or qualities which constitute this significance (possibly with some listed examples) rather than only a list. The prime reasons for this suggestion are (i) as technology changes some infrastructure becomes less significant and/or effective and (ii) the heading to the list ("Regionally significant infrastructure includes") suggests that other infrastructure is regionally significant, but the definition gives no guidance as to what determines this, leaving the council vulnerable to legal dispute. Qualities might include reference to:

- (a) regional resilience in the context of natural disasters (e.g. earthquakes);
- (b) regional cultural and heritage tourism;
- (c) regional climate change targets;
- (d) regionally sustainable transport targets.
- (e) economic efficiency and growth;

Water Standards

The Architectural Centre supports:

- (a) the requirement for the documentation of the existing situation and recommends that such a requirement be made explicit
- (b) the increasing improvement of water quality until all waterways are drinkable, and there are no contaminant/sediment discharges to land or water.
- (c) the requirement, at Regional Council level, for research to identify and improve (or replace) current practices which negatively impact on water quality, and recommend that such a requirement be explicit
- (d) reduction in freshwater use, including regulating to end the use of drinkable freshwater to flush toilets.
- (e) incentivising localised rainwater collection in new building and other development projects.

We support the objectives to address improving water quality as well as reducing the quantity of water used (e.g. GP.P2 (a) (ii) and (iii)), and the setting of timeframes and priorities to achieve these targets (p. 43). We also support LW.P81 (esp water sensitive urban design) and M15 and encourage the council to stipulate an extended requirement for water sensitive urban design beyond issues related to stormwater discharges.

We suggest the following amendments (in red) are made to the objectives and that any corresponding rules are updated to reflect these:

RP.O5: Sufficient **fresh**water of a suitable quality is available for the **health needs of people, and supply for this need is prioritised over all other needs.**

PR.O7: Freshwater **and recycled greywater** is available in quantities and is of a suitable quality for the reasonable needs of **livestock.**

RP.O13: The quality of water in the region's rivers, lakes and **natural wetlands**, groundwater and the coastal marine area is maintained or improved. **Where water quality is lower than that prescribed in the NPS Freshwater Management Plan, quality will be improved to meet that standard within one year. The objective is for water quality to improve both at specific sites and overall across the region.**

RP.O14: Rivers, lakes, **natural wetlands** and coastal water are suitable for contact recreation and **Māori use, if they are not already, with all rivers, lakes. natural wetlands and coastal water to be suitable for drinking within 10 years,** including by managing water quality is:

- (a) all coastal for primary contact recreation as described in Schedule H Table H.1, and
- (b) regionally significant primary contact recreation rivers and lakes, as shown in Map 20, for primary contact as described in Schedule H Table H.2, and
- (c) all other rivers, lakes and **natural wetlands** for secondary contact with water to meet, as a minimum, the outcomes in Schedule H Table H.2.

RP.O55 - The **efficiency** of water use is improved through time, including by means of:

- (a) efficient infrastructure and application methods, and
- (b) **good management practice**, including irrigation, domestic municipal and industry practices, and
- (c) maximising reuse, recovery and recycling of water and contaminants, and
- (d) enabling a dynamic water allocation regime.
- (e) maximum reduction of use of freshwater**
- (f) requiring greywater only for toilet flushing**
- (g) incentivising localised rainwater collection**

GP.P5 Where minimisation of adverse effects is required by policies in this plan, minimisation means reducing adverse effects of the activity to the smallest amount practicable and shall include:

- (a) consideration of alternative locations and methods for undertaking the activity that would have less adverse effects, and
- (b) locating the activity away from areas identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule E (historic heritage), Schedule F (indigenous biodiversity), and
- (c) timing the activity, or the adverse effects of the activity, to avoid times of the year when adverse effects may be more severe, or times when receiving environments are more sensitive to adverse effects, and
- (d) using **good management practices** for reducing the adverse effects of the activity, and
- (e) designing the activity so that the scale or footprint of the activity is as small as practicable.
- (f) the requirement for avoidance to be transparently demonstrated as not possible**

GP.P6 The cultural, social and economic benefits of using water for:

- (a) aquaculture, and
- (b) treatment, dilution and **disposal** of waste water, and
- (c) commercial uses associated with the potable water supply network and industrial processes, and
- (d) community and domestic water supply, and
- (e) electricity generation, and
- (f) food production and harvesting, and
- (g) irrigation and stock water, and
- (h) fire fighting, and
- (i) contact recreation and **mana whenua use**, and
- (j) transport along, and access to, water bodies

shall be recognised and provided for. **The cultural, social and economic benefits do not include use of drinkable freshwater to flush toilets.**

LW.P117 The amount of water taken or diverted through resource consents shall be reasonable and used efficiently, including consideration of:

- (a) applying the reasonable and efficient use criteria identified in Schedule R (efficient use) to new users immediately, while existing users replacing **existing resource consents** have a period of four years from the date of the plan being made operative to meet the criteria, and
- (b) maximising the efficient use of water when designing systems to convey or apply water, and
- (c) industry guidelines.
- (d) the requirement for all new housing to use greywater for toilet flushing.**
- (e) the requirement all new housing to incorporate roof collected rain water into plumbing system.**

Infrastructure & land use

We recommend the inclusion of "Resilience" in the definitions section, with a corresponding meaning of "Resilience is the capacity to adapt to changing conditions and to maintain or regain functionality and vitality in the face of stress or disturbance." This is the definition of resilience adopted by the Resilient Design Institute (<http://www.resilientdesign.org/>). Reference to the RSI Resilient Design Principles may also be of use.

We support CM.P132 (especially the requirement to manage use and development with respect to compatible scale, location, density and design) and CM.P138. We suggest the following amendments (in red) are made to the objectives and that the corresponding rules are updated to reflect these:

RP.O9: The use and ongoing operation of **existing regionally significant infrastructure** and **renewable electricity generation activities** is protected from new or inappropriate development located alongside.

RPO.15: The **risk, residual risk**, and adverse effects from natural hazards and climate change on people, the community and infrastructure are reduced, **and mitigated for by the resilient design of infrastructure.**

RP.O16: **High hazard areas are identified, and this information is publicly available.** Inappropriate use and development in **high hazard areas** is avoided.

RP.O42 Human health, **property**, and the environment are protected from the adverse effects of **hazardous air pollutants**. **The vulnerability of children, older people and the sick to these adverse effects is recognised with lower minimum quantities of hazardous air pollutants required in areas of kindergartens, schools, rest homes and hospitals.**

RP.O43 The nuisance effects on ambient air quality from odour, smoke (i.e. wood smoke) and dust are reduced. **The exacerbation of global warming caused by CO₂ emissions is avoided.**

RP.O46 Discharges to land do not create contaminated sites. **Existing contaminated sites are identified. Identified contaminated sites are remediated.**

RP.O48 The adverse effects on soil and water from land use activities are **avoided or** minimised **and remediated.**

RP.O49 The adverse effects of **livestock** access on **surface water bodies** are **avoided or** minimised **and remediated reduced.** **Existing water quality is maintained or improved.**

RP.O59 Use and development in the **Lambton Harbour Development Area** is compatible with its surroundings and the central area of Wellington City, **and exemplifies sustainable and net-zero energy design**

GP.P10 **Existing Regionally significant infrastructure and renewable electricity generation activities** shall be protected from new incompatible use and development occurring under, over or adjacent to it, by the location and design of any new use and development to avoid, remedy or mitigate any **reverse sensitivity** effects.

GP.P15 Use and development, including hazard mitigation methods, in **high hazard areas** shall be avoided except where:

- (a) they have a **functional need or operational requirement** to be so located, and
- (b) the **risk** to the development and/or **residual risk** after hazard mitigation measures, assessed using a **risk based approach**, is low, and
- (c) the development does not cause or exacerbate natural hazards in other areas, and
- (d) interference with **natural processes** (coastal, fluvial and lacustrine processes) is minimised, and
- (e) natural cycles of erosion and accretion and the potential for natural features to fluctuate in position over time, including movements due to climate change and sea level rise, are taken into account.

In these cases, resilient design will be used for any development.

GP.P17 Particular regard shall be given to the potential for climate change to cause or exacerbate natural hazard events that could adversely affect use and development including:

- (a) coastal erosion and inundation (**storm surge**), and
- (b) river and lake flooding and erosion or aggradation, and
- (c) **stormwater** ponding and impeded drainage, and
- (d) sea level rise, using the best available estimate for the Wellington region, **and**
- (e) design resilience (including site location), and**
- (f) the ability to meet targets to reduce green house emissions, and**
- (g) prioritising zero-energy development and localised water and energy supply.**

CM. P135 New structures, replacement of a structure or any addition or alteration to a structure in a site identified in Schedule C (mana whenua), Schedule F4 (coastal sites), Schedule F5 (coastal habitats) and Schedule J (geological features) shall be avoided, except where:

- (a) the new structure, replacement of the structure or any addition or alteration to the structure is for the specific purpose of providing protection for the values identified in or using Schedule C (mana whenua), Schedule F4 (coastal sites), Schedule F5 (coastal habitats) or Schedule J (geological features), or
- (b) the structure is for educational, scientific or research purposes that will enhance the understanding and long term protection of the coastal marine area, or
- (c) the structure will provide for navigational safety, or
- (d) it is **demonstrated to be** necessary to enable the **resilient and** efficient operation of **regionally significant infrastructure**, and

(e) there are no practicable alternative methods of providing for the associated activity.

Heritage

We suggest the addition of the following structure and sites to Schedule E: Sites with significant historic heritage values (coastal) ... [pp. 309 ff]

(a) Pencarrow Lighthouse

With regard to GP.P33 We note that at times, due to insufficient resourcing, it is not always possible to list all the heritage items which have valid historic heritage values, and that it is important that policies are cognisant of this.

We suggest the following amendments (in red) are made to the objectives and that the corresponding rules are updated to reflect these:

RP.O26 **Significant** Historic heritage values are protected from inappropriate modification, use and development.

[regarding 3.9RP.O26: We note that the RMA requires the protection of historic heritage from inappropriate subdivision, use, and development" s6(f), and so recommend consistency with the Act]

RP.O35 - **The values of outstanding natural features and landscapes, the landscape values of special amenity landscapes, are identified.** The values of identified outstanding natural features and landscapes are protected from inappropriate use and development and the landscape values of identified special amenity landscapes are maintained and enhanced.

GP.P34 Demolition or removal of a structure with significant historic heritage value identified in Schedule E1 (heritage structures), Schedule E2 (wharves and boatsheds), Schedule E3 (navigation aids), or Schedule E5 (freshwater heritage) is inappropriate except where the structure is:

- (a) substantially damaged by fire or natural hazard, and
- (b) it is impracticable to repair it.

Buildings with a demonstrated history of deferred maintenance will have a higher threshold with regard to this provision, making it more difficult for neglectful owners to demolish their buildings on these grounds. The expectation is that owners will invest in appropriate and regular maintenance of their buildings.

GP.P44 Use and development in the coastal environment, **natural wetlands**, and the beds of lakes and rivers and their margins adjacent to an outstanding natural feature or landscape or a special amenity landscape identified in a district plan, must have particular regard to the identified values, **including cultural values.**

CM.P135 New structures, replacement of a structure or any addition or alteration to a structure in a site identified in Schedule C (mana whenua), Schedule F4 (coastal sites), Schedule F5 (coastal habitats) and Schedule J (geological features) shall be avoided, except where:

- (a) the new structure, replacement of the structure or any addition or alteration to the structure is for the specific purpose of providing protection for the values identified in or using Schedule C (mana whenua), Schedule F4 (coastal sites), Schedule F5 (coastal habitats) or Schedule J (geological features), or

- (b) the structure is for educational, scientific or research purposes that will enhance the understanding and long term protection of the coastal marine area, or
- (c) the structure will provide for navigational safety, or
- (d) it is necessary to enable the efficient operation of **regionally significant infrastructure**, and
- (e) there are no practicable alternative methods of providing for the associated activity.

The requirement for avoidance to be transparently demonstrated as not possible.

Democratic Consultation

The document refers to the ambition to ensure collaborative development of both regional and catchment specific programmes, with an emphasis on local inputs into decision making (p. 3). We consider this consultation process an important part of this decision-making process. Key to the integrity of this process is the ability for people to meaningfully engage with the material consulted on. We are two main comments to note in this regard:

(a) the length and complexity of the material likely mean that there will be people who are interested and/or affected by the proposal who were intimidated by the material and did not participate. While we appreciate that the plan exists within a technical and legal context which necessitates volume and detail, we wonder if there are issues around education and producing more accessible supplementary material which would encourage participation. We suggest the regional council work with the local council to enable Wellington's citizens to better understand the relationships between key RMA documents, and how they impact on their environment.

(b) the consultation period largely co-incided with the WCC consultation on their Draft Suburban Reserves Management Plan. The scheduling of the consultation coincident with the period of the WCC Draft Suburban Reserves Management Plan may have meant that people or groups whose interests overlap these two documents might have only had the resources to participate in one consultation. We ask that the GWRC work with other groups such as central and local government to ensure that related consultations do not coincide, to encourage the greatest participation from the wider community.

Thank you for this opportunity to comment on this Draft Natural Resources Plan. If you have any questions please do not hesitate to contact me.

best wishes



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