

WELLINGTON CONSERVATION BOARD

Te Runanga Papa Atawhai O Te Upoko O Te Ika A Maui

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8 June 2009

Fran Wilde, Chair
Greater Wellington Regional Council
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Dear Fran

SUBMISSION ON DRAFT GREATER WELLINGTON REGIONAL COUNCIL REGIONAL POLICY STATEMENT

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DRAFT SUBMISSION ON GWRC'S RPS

Introduction

The Wellington Conservation Board (the Board) thanks you for the opportunity to make a submission. If hearings are held, we would welcome the opportunity to speak in support of this submission.

Conservation boards were established by Parliament to ensure that the community has a voice in conservation management. The Board is appointed by the Minister of Conservation and its functions and powers are set out in section 6 M & N of the Conservation Act 1987. Its powers include advocating its interest at any forum including statutory processes.

Our Submission

The RPS provides a well-organised, detailed and balanced framework to guide the management of the regions natural resources and we congratulate the Regional Council on that. The Department of Conservation's submission on the RPS takes a detailed look at each Policy; we have not duplicated this. Rather, the Wellington Conservation Board has taken a broader approach to the RPS document as a whole, identifying what we believe are omissions or areas where we seek a different emphasis.

1. The RPS gives no guidance on the anticipated change in human and environmental pressures in the region in the next 10-years. Policies should take account of these. We were unable to find information in the RPS or on the GWRC website about the projected changes in population in the region, likely changes in land-use, areas with imminent threat of ecosystem damage or other pressures to which the Regional Council must give management priority. The RPS identifies where serious current issues exist (e.g. in water quality degradation, coastal subdivision pressures) but it doesn't relate this to pressure trends that are likely over the next decade.

We would like to see some assurance given in the final version of the RPS that:

- the Council has identified likely trends in human and environmental pressures in the region in the next 10-years,
 - its policies and methods have taken account of these, and
 - it is ready to allocate priorities and manage their impacts where needed.
2. The RPS identifies (p.5) a number of "companion" statutes to the RMA and it is noted that these may provide "alternative and better means of addressing some issues". We believe that, in particular, the RPS should specifically identify the importance of aligning with the DOC's Conservation Management Strategy for the Wellington Region. The Council and DOC have common interests - many of the ecosystem services identified in the RPS originate from DOC-managed land and water bodies, and much of the biodiversity protection in the region involves precisely the same populations of indigenous species and introduced pests. We believe that over the next decade the two agencies should align and rationalise the work done in the natural environment to achieve the best return on investment. A joint approach to information, monitoring and priority setting would assist this. Synergies would arise, for example, by harmonising pest control in areas of high biodiversity value.
 - We would like to see specific mention included in the RPS of the advantages of a joint approach with DOC on biodiversity, pest and ecosystems management and a stated intention to explore this.
 3. Section 2 of the RPS begins with a Maori proverb which identifies two crucial duties – one towards nature and one towards people. The remainder of the Section then goes on to address the sustainable use and development of natural resources to satisfy human needs, the community outcomes sought and the challenge of integrated management to suit diverse human aspirations. The intrinsic value of the bellbird and its right to exist seems to have got lost along the way. What outcomes are sought for ecosystems and indigenous biodiversity?

- We would like to see this Section include a sub-section entitled **Natural Outcomes for the Wellington Region.**

The following sentence in Section 2 (p.7) sets a very unfortunate tone - *“In other words, natural and physical resources can be used and developed by people and communities to provide for their economic, social and cultural well-being, and health and safety, but in such a way that ensures the potential of these resources are (sic) sustainable for future generations, and ecological systems retain their life-supporting capacity and are not overly degraded.”*

Not all resources should be used and developed (e.g. bellbirds), nobody wants to accept moderate degradation and many people would like to see past degradation reversed.

- May we suggest an alternative wording:
“In other words, natural and physical resources may be used and developed by people and communities to provide for their economic, social and cultural well-being, and health and safety, but in such a way that ensures natural resources are conserved for future generations, and the life-supporting capacity of ecological systems is retained or restored (remainder deleted).”

4. Also in Section 2, we would like to see more emphasis in the RPS on recognising and supporting the growth in community initiatives in beachcare, protecting biodiversity and terrestrial ecosystems and reducing environmental “footprints”. The extent to which this is done could be addressed in a Community Outcome about *involvement* and adding it to the list on p.9 & 10. It would not be difficult to measure performance of such an outcome by keeping a record of the communities and places involved.

- We suggest inclusion of this community outcome:

Involvement: *communities recognise the importance of ecosystem health and natural resource conservation and are involved in care and stewardship of places they value.*

- If the two new outcomes we have suggested above have already been set through a different process than the RPS, we would still like our points 3 and 4 to be acknowledged in some other way in the RPS. We would then like them to be considered when the outcomes are reviewed in the future.
5. The RPS provides an excellent and well-organised set of Objectives, Policies and Methods for achieving sustainable management and protection of the region’s resources and environment. The types of methods include the preparation of strategies, action plans, descriptions and information. However, it is unclear why a particular type of method is preferred for a particular policy. For example:
 - a. Action plans are proposed for coastal & marine and stormwater but a strategy is proposed for water. Why not an action plan for water? In fact, why not an action plan for all major areas of responsibility to avoid the sterility that sometimes besets strategies? GWRC action plans would be helpful to organisations like DOC so that its own action plans, now in preparation, can be harmonised – leading to possible synergies.

- We suggest action planning is the proper method to prioritise work in every key topic area, action plans should be revised periodically and should be shared with key organisations such as DOC.
- b. The RPS methods propose that information is to be provided on such matters as restoration of degraded water bodies and the natural character of the coast, maintaining and enhancing indigenous ecosystems, water conservation and efficient use and sustainable land management practices. All or some of these would be better cast as guidelines and/or best practice documents to give effect to the Council's stewardship role (and to also to help define more measurable performance targets for the Council). In other words, the information should have a defined purpose.
- We suggest that in the Methods sections of the RPS the Council is more proactive so that where it intends to provide information, this is presented as guidelines and/or best practice.
6. The RPS identifies many anticipated environmental results and it is recognised that there is a question of affordability in defining what should be measured. However, we feel that in the cases of freshwater and terrestrial ecosystems, in particular, there should be a greater focus on measuring and reporting restoration of the worst degraded sites.
- We would like to a reporting mechanism to deal with restoration of those sites considered the worst examples of environmental degradation in the Wellington region.
7. No measurable result is defined for water quality protection *per se* (p.148). Using freshwater biodiversity indices and assessing public perceptions are good approaches but what appear missing are measurable environmental results for water quality, e.g. P, N, oxygen concentrations, coliforms. These would give more precise measures to show whether GWRC is solving the many water quality problems it has identified in Section 3. This may be an oversight as GW has a very good report-card system in place.
- We would like to see an anticipated result that says water quality will be maintained in highly valued water bodies and improved in degraded ones.
8. We would like to see a greater emphasis on anticipated environmental results that measure indigenous ecosystem health (topic Indigenous Ecosystems, Objective 16, p. 150). This should address the maintenance of the services that indigenous ecosystems provide and the restoration of degraded places.

We suggest:

- rewording of the first and third AERs for this Objective thus: (i) ...have identified indigenous ecosystems with significant biodiversity *and ecosystem services* values; (ii) no loss of indigenous ecosystems and habitats with significant biodiversity *and ecosystem services* values....

- addition of an AER that anticipates that *a range of indigenous ecosystems are restored*. This could added to the fourth AER under Objective 16.

Thank you again for the opportunity to make this submission on the Greater Wellington Regional Council's Proposed Regional Policy Statement.

A handwritten signature in black ink, appearing to read 'Helen Algar', enclosed within a faint, light-colored circular stamp.

Helen Algar, Chair
Wellington Conservation Board
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