

Proposed Natural Resources Plan:

Submitter:

Wellington Civic Trust

Submitter Number:

S62

Form 5: Submission on the Proposed Natural Resources Plan for the Wellington Region
This is a submission on the Proposed Natural Resources Plan for the Wellington Region pursuant to
Clause 6 of Schedule 1, Resource Management Act 1991



To: Freepost 3156
Wellington Regional Council
PO Box 11646
Wellington 6142

Or email: regionalplan@gw.govt.nz

Wellington Regional Council

23 SEP 2015

Your details

Full name:

Organisation name:
(If applicable)

WELLINGTON CIVIC TRUST

Address for Service:

PO Box 10183, Wellington 6143

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Sylvia Allan

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Electronic communication

Wellington Regional Council has a preference for providing information about the Proposed Natural Resources Plan via email. We will send you updates on the process, information and provide you with details of any meetings and the hearing. Please tick here if you do not agree to receive communication via email.

Email address:

sylvia.allan@ihug.co.nz

Trade competition

I/we could not gain an advantage in trade competition through this submission. [Go straight to **Your Submission**]

I/we could gain an advantage in trade competition through this submission.
If you could gain an advantage please complete one of the following:

I/we are directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

I/we are not directly affected by an effect of the subject matter of my submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

The Wellington Civic Trust (the Trust) appreciates the opportunity to make a formal submission on the Proposed Natural Resources Plan (NRP) for the Wellington Region. The Trust acknowledges that some of its comments on the draft have been addressed. However some remain and are outlined below.

The Wellington Civic Trust was founded in 1981 and has among its objectives:

- To promote a civic environment whereby the City of Wellington, its surroundings, and its adjacent countryside becomes a resource for the use, benefit and enjoyment of all Wellington citizens;
- To stimulate public interest in and care for the beauty, history and character of the City of Wellington and its surroundings and adjacent countryside and coastline and its dignity as the Capital City;

- To create or improve features of beauty or interest in and about the City and its contiguous countryside and coastline.

While the Trust has a wider interest in the region and its sustainable management, its key focus is the Wellington City urban area and nearby surroundings, including the coast and coastal marine area (CMA). The Trust supports a compact city with effective public transport which contains and, as far as is practicable, minimises adverse effects on the wider natural environment.

These submissions are made on the basis of that focus.

The Trust notes the important role of the Whaitua committees in the Management of water resources in the region. The Trust has a particular interest in the Wellington Harbour and Hutt Valley Whaitua and seeks that sufficient resources are made available for it to urgently advance its important work of ensuring water quality is generally improved in accordance with the National Policy Statement for Freshwater Management, given that Wellington City and the Hutt Valley contain the region's largest and most intensely developed urban areas. We look forward to seeking these national policies implemented more effectively both within and beyond the confines of this Plan.

Your submission

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):	My submission on this provision is: →	<input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
Section 2 – Definition of Lambton Harbour	Reasons for my submission: →	This definition, in association with Map 32, effectively extends the Lambton Harbour area to include wharfs and CMA to the north. This has consequences in terms of planning for this area.
Map 32	I seek the following decision from WRC (give precise details): →	The Civic Trust supports the extension as provided for in the definition and map in general terms subject to the careful management of development in the area.

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Section 2 – Definition of "Whaitua"	Reasons for my submission: →	The reference to "designated area" in this definition is confusing as "designated area" has a specific meaning in the RMA. This point was made in the Trust's submission on the draft Plan and it is disappointing that we have to make it again.
	I seek the following decision from WRC (give precise details): →	Replace "designated area" with "specified area" or "defined area".

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Objectives O10, O19, O23, O34, O53 to O56	Reasons for my submission: →	These objectives are particularly supported.
	I seek the following decision from WRC (give precise details): →	Retain the specified objectives with their current wording.

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): Objective O57	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<p>This objective is the only one that specifically applies to the Lambton Harbour area (as extended through the Plan definition and maps). The only guidance for development in this area is that it is “compatible” within its surroundings and the Central Area of Wellington City.</p> <p>The concept of “compatibility” is generally endorsed in this context, but given the more detailed policy (subject of a later submission), the sensitive nature of the location (including the extension into the Lambton Harbour North area), and the lack of clarity in the Plan on how the objectives relate to each other, it is possible that Objective O57 could result in very intensive development. The Trust seeks that Objective O57 incorporates reference to O55 and O56.</p>
	I seek the following decision from WRC (give precise details): →	Reword Objective O57 by adding at the end of the objective “..... and has particular regard to Objective O55 and O56”.

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): Policies P46, P47	My submission on this provision is: →	<input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	The Trust is supportive of this approach to historic heritage values, and the conjunctive nature of the limitations on demolition in this policy. The Trust however notes that some items currently protected in the Regional Coastal Plan no longer have protection and opposes this reduction in protection.
	I seek the following decision from WRC (give precise details): →	Retain the policies unchanged (and expand Schedules E1/E2 as requested in a later submission).

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): Policies P55, P58, P59, P60	My submission on this provision is: →	<input type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	The Trust is generally supportive of the approach in these policies, which are in addition to the general ambient health and safety policy in P52. However, it considers that the amenity policy, P55, is not sufficiently embedded in relation to particular risk areas covered by P59 and P60. The city's urban areas, particularly Wellington's Central Area receives discharges from industrial activities and fumigant use which reduces its amenity in certain places at certain times.
	I seek the following decision from WRC (give precise details): →	<p>In Policy P59, add mention of amenity as follows “.... including <u>adverse effects on amenity, and</u> any noxious or dangerous effects”.</p> <p>In Policy P60, add mention of amenity as follows “property, <u>amenity</u>, and the environment”.</p>

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): Policies P73 to P79	My submission on this provision is: →	<input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	The Trust recognises that a comprehensive approach to stormwater management is needed and that monitoring and education are essential components.
	I seek the following decision from WRC (give precise details): →	Retain policies unchanged.

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): Policy P142	My submission on this provision is: →	<input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	This is a detailed and comprehensive policy which the Trust can generally support. However, there appears to be a policy gap in relation to the recognition of the Wellington Waterfront Framework 2001 in this Plan. This has been reconfirmed in recent years by WCC and remains a core document for the harbour area south of Bunny St as Wellington's acknowledged "jewel in the crown". The harbour area north of Bunny St may have different characteristics but have strong visual and functional relationships between each other and across land and sea, and any GWRC / WCC divide as to planning intent and urban design principles risks undermining the optimum development of both areas. Omitting clear reference to the Waterfront Framework risks further concern from citizens who, reasonably enough, see their harbour in a holistic "character of the city" sense rather than in a technical / administrative sense split between two different councils. While there is a reference to design guides in Policy 142(j) and there is a design guide in Wellington City District Plan for the Lambton Harbour North area, there is no design guide for the remainder of the Lambton Harbour area. Rather, there is reference to (but not incorporation of) the Framework in the District Plan. It is unlikely that that document would be regarded as "contained within" the District Plan.
	I seek the following decision from WRC (give precise details): →	Include specific mention of the Wellington Waterfront Framework 2001 in Policy P142(j).

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number): Schedule E1 and E2 – Historic Heritage Structures and Historic Heritage Wharves and Boatsheds	My submission on this provision is: →	<input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input checked="" type="checkbox"/> I wish to have the specific provision amended
	Reasons for my submission: →	<p>The schedules have retained some of the items in the Regional Coastal Plan, but not all. The Section 32 analysis relating to the items in the Regional Coastal Plan, including mapped items in Lambton Harbour, is critical of the information on which they were identified.</p> <p>However, it needs to be acknowledged that most, if not all, of the items in the present coastal plan have been through two statutory planning processes already over time and therefore</p>


		<p>have their own integrity and recognition which may not be acknowledged by people in the category of "conservation architect, historian and archaeologist" who have lately been brought in to advise GW and who comprise one opinion only. Missing from the list is Harbour Board Gates 1899 on Queens Wharf (which may have been shifted), and part of the Westport Chambers facade (Circa Theatre – which is no longer listed on the District Plan).</p> <p>Wharves and wharf edges and reclamation edges which are still in place are however missing. Parts of these areas are picked up by the comprehensive listing of Queens Wharf, Ferry Wharf, Railway Wharf, Taranaki Street Wharf and Waterloo Quay Wharf. However, the wharf and reclamation edge protection, which reflects the harbour edge at the time the Lambton Harbour waterfront was handed over to the city for public use, it is not included.</p>
	<p>I seek the following decision from WRC (give precise details): →</p>	<p>The Civic Trust seeks that the parts of the wharf edges and reclamation edges which are currently protected under the Regional Coastal Plan are also recognised and incorporated as part of the sites of historic heritage values in the Proposed Plan.</p>

The specific provisions of the Proposed Natural Resources Plan that this submission relates to are:

<p>The specific provision of the Proposed Natural Resources Plan that my submission relates to is (please specify the provision/ section number):</p> <p>Schedules F1 and F4 – Kaiwharawhara Stream</p>	<p>My submission on this provision is: →</p>	<p><input checked="" type="checkbox"/> I support the provision <input type="checkbox"/> I oppose the provision <input type="checkbox"/> I wish to have the specific provision amended</p>
	<p>Reasons for my submission: →</p>	<p>The Trust supports the inclusion of the Kaiwharawhara Stream and estuary within these schedules. The Trust has a particular interest in the northern gateway approach to Wellington City, of which the Kaiwharawhara reclamation area and Kaiwharawhara Stream is a part. The Trust considers that this area should be the subject of a joint planning exercise for its future between the City and Regional Councils, to ensure its long-term sustainable management. It is disappointing that such a joint planning exercise has not been undertaken prior to the development of this Plan - especially given the continuing and close working relationships that GWRC has with the transport entities (CentrePort, KiwiRail and NZTA) operating in this area. Someone has to take leadership in this, and GWRC with its harbour and land transport accountabilities, is well positioned to do so on the basis of clear and strong commitments to integrate its planning regimes.</p>
	<p>I seek the following decision from WRC (give precise details): →</p>	<p>Retain the listing as recognition of this important area.</p>

Attendance and wish to be heard at hearing(s)

- I/We do wish to be heard in support of my/our submission
[Note: This means that you wish to speak in support of your submission at the hearing(s).]
- I/We do not wish to be heard in support of my/our submission
[Note: This means that you cannot speak at the hearing. However, you will still retain your right to appeal any decision made by the Wellington Regional Council to the Environment Court.]
- If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature:  Date: 22/09/2015

[Person making submission or person authorised to sign on behalf of person making submission. NB. Not required if making an electronic submission]

Publication of details

Wellington Regional Council is legally required to notify a summary of submissions, including your name and address for service as provided on this submission form. Your name and address are included so that a person making a further submission is able to serve you with a copy of it.