



P.O. Box 41029 EASTBOURNE NEW ZEALAND

PROPOSED REGIONAL POLICY STATEMENT 2009 – EHEA Submission/Comments

Overall this document is much stronger and more straightforward, though still with some jargonistic language – generally much improved.

We do have a problem with its Objectives, Policies, and methods being split up and discussed in different parts of the document. This leads to the possibility that important matters may be missed.

Policy 1: Term 'Reverse sensitivity' is odd. Is it an adjective or a verb? If a verb should it be 'Reversing ..' to match the titles of the following Policies.

But is it the best set of words to use in this context? Why not 'Separating sensitive from...' or 'Dissociating sensitive and (heavy) industrial activities'?

Objective 21, Policy 30: "promote high density ... development etc." This is ok, but should not be at the expense of sacrificing green spaces and gardens for asphalt. High density infill means increased areas of hard surfaces, which contravenes Policies 40 & 41.

Policies 24(b)(ii) & 26(b)(ii): is term 'vividness' appropriate? Would not 'Visual impact' be better?

Policy 28 (I think I have this right, Objective 28 is different from Policy 28?) also Policy 29: whichever - this Policy is really good, with more detail, and hopefully it will have more impact as it has real references, offers guidelines and NZ Standards that can be applied.

Policies 40, 41 are very good for minimising the effects of earthworks and vegetation disturbance because ... etc., and for minimising contamination of stormwater: They cover (a) limiting area of new impervious surfaces, (b) using water-permeable surfaces to reduce volume of run-off – both of which are very good. (d) to (l) are all good.

Policy 50, now Policy 52: is now much stronger than in the Draft. But can it be more than a 'consideration'? It is about minimising risks of natural hazards and it's all useful, e.g. floor areas to be above 1:100yr flood level. This means that houses are to have foundations and not slabs sitting on the ground (some houses in Leighton Ave Moera have slab foundations and, surprise surprise, they get flooded when the Waiwhetu tributaries come up)

Objective 11, Policy 63 in Draft: energy production may be covered by Objective 9(b), which is to diversify type and scale of renewable energy development?

Fresh Water section

Policy 52, Method 50 seems to cover access issues.
Method 29 takes the whole catchment approach, and control of area of hard surfaces v run-off etc. seems to be included – Good

Natural Hazards is much better now.
Objective 20, Policy 28 have been added, and/or enlarged and are much better.

Policies 49, 24-27 seem to cover these matters about landscape, avoiding & reducing hazards.

Policy 59: this is much better and more positive as it is about 'retaining' soils of high value, not 'loss of' which you could interpret that high value soils should be lost!!

Method 29: its whole catchment approach is an improvement.
What's happened to the maps showing areas of coastal significance? Maybe too much emphasis on only one of the significant landscape features, e.g. should have maps showing significant geological features, and vegetation as well?

With regard to Appendix 1 (Indigenous Ecosystems) we are unclear as to why this is limited to rivers and lakes of regional significance. What about areas of significant native forest or native fauna, or landscape or historical significance? The change from the draft appendix 1 is also not obvious.

Air Quality

The stated objectives and policy with regard to air quality sound sensible and comprehensive. However, the Regional Council might like to expand on two aspects.

- 1) Air quality appears to be looked at within individual airsheds, and it is not clear whether the proposed policy considers the implications of the impact of air quality in neighbouring airsheds, or the effects of wind. The high winds in the Wellington region tend to spread air pollution in either a wide area, or a focused area downwind of the source of pollution. A case in point is lead pollution from the Exide lead processing plant in Seaview, which is strongly directional, depending on wind strength and direction. These far field effects need to be considered when assessing environmental impacts, and may not necessarily show up in more local surveys.
- 2) Following on from the above, the cumulative effect of air pollution from a number of sources should also be taken into account (as suggested by EHEA in the 2008 comments), and again, these cumulative effects may be uneven, with strong focusing in particular regions, depending on atmospheric conditions (wind, temperature etc).
- 3) It is not clear whether noise is considered as part of air quality, though environmental noise is certainly becoming one of the major sources of pollution in the modern world. Again, noise is highly dependant on atmospheric conditions, and will be strongest down-wind of a noise source, and may go hand in hand with atmospheric pollution.

Coasts

The stated objectives and policy with regard to coastal management sound admirable, although, given the enormous value of coastal properties today, they will need to be very robust indeed to withstand developer pressures.

- 4) One area of coastal planning that might need greater emphasis is the impact of sea level change (and associated storms surges etc). Current sea-level change is relatively modest (a few mm/yr), but projected sea level change over the coming century, as a consequence of global climate change, is now thought to exceed 1 metre, with several metres possible (see latest IPCC updates on projected sea level change). Given this scenario of significant long term sea level change, it seems sensible for the Council to start putting in place a strategy to deal with it. For example, it may be sensible to require new infrastructure developments, which have design lives of many decades, to be placed well away from the effects of future metre-scale sea level rise. This way, a general strategy of moving to higher ground can be implemented without the huge expense of dealing with the problem at a later date. Even if such a policy today may seem too futuristic, it would certainly be worth spelling out its aspirations more clearly in the Regional Policy as soon as possible. Such a strategy would clearly have important implications for many other aspects of the Regional Policy, including infrastructure, land-use, amenities etc.

EHEA
7 June 2009