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Proposed Regional Policy Statement
Greater Wellington Regional Council
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**Submission on Proposed Regional Policy Statement for the Wellington
Region, 2009**

Attached is the Masterton District Council's submission on the Proposed
Policy Statement for the Wellington Region, 2009.

Thank you for the opportunity to make a submission and for extending the
time frame for submissions.



Susan Southey
District Planner

2 June 2009



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SUBMISSION ON THE PROPOSED REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION, 2009

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The Council wishes to be heard in support of their submission.

1. General Comment.

- 1.1 The Masterton District Council (MDC) is pleased to be able to make a submission on the Proposed Regional Policy Statement. (PRPS)
- 1.2 The MDC understands that the prime role of the RPS is to provide for the integrated management of the natural and physical resources of the region. The PRPS however has the general assumption that there are adverse effects from all activities, this is not consistent with the language of the Resource Management Act. (RMA) The RMA is an enabling document with a presumption that everything is permitted unless there is an adverse effect.
- 1.3 The Masterton District Council considers that the PRPS is too prescriptive and that the balance between human habitation and ecosystems is too great in favour of ecosystems.
In some instances, which will be dealt with separately, the words used are not those used in the RMA and are more prescriptive, giving the whole document a negative feel.
- 1.4 The MDC believes that the words 'encourage and consider' should be used within the document instead of the word 'promote'.
- 1.5 Overall the Masterton District Council considers that the objectives, policies and rules in the PWCDP provide for the implementation of the majority of objectives, policies and methods in the PRPS.

2.0 Air Quality 3.1

2.1 The MDC is concerned that the needs of their community, both social and economic will not be given sufficient consideration when Airshed Action Plans are prepared.

Masterton District has a considerable proportion of residents who will not be able to keep warm without imposing a **significant financial burden**, if rules are introduced to do away with wood burning fires.

2.2 Policy 1 requires District Plans to include policies and rules regarding reverse sensitivity in relation to odour, smoke and dust. The Masterton District is a rural community, where farming is an industry, where the economic benefits of this primary production sector is vitally important to the wellbeing of the whole community. For example, silage, as a source of feed for cattle is vitally important, and it is of concern to the Council that there is the **potential for additional costs on the primary production sector** through resource consents and/or not being able to produce and use silage.

2.3 Relief Sought

2.3.1 *Masterton District Council requests that the preparation of an Airshed Action Plan is carried out in consultation with the Masterton District Council and their community.*

2.3.2 *That the wording in the Air Quality chapter includes recognition of the economic and social benefits of the primary production sector.*

3.0 Coastal Environment 3.2

3.1 The objectives, policies and rules in the PWCDP together with the work undertaken for the Wairarapa Coastal Strategy will ensure that the natural character of the coastal environment is preserved and protected from *inter alia* – inappropriate subdivision and development.

3.2 The landward extent of the coastal environment has been identified as part of the combined plan process.

3.3 Objective 8 Public access to and along the coastal marine area, and lakes and rivers should provide for the exclusion of the public from areas surrounding or alongside public infrastructure where the security of that infrastructure could be compromised. e.g. water supply intakes and reservoirs and wastewater treatment plants.

3.4 Method 34 which requires the WRC to prepare a regional stormwater action plan will have implications for the MDC for **both costs and consent application**.

Whilst an integrated approach with the WRC would be advantageous, the aim of the PRPS is to 'manage waterways for ecological purposes'

with no provision for the primary use of waterways which is to convey water.

This issue will be dealt with elsewhere in the submission.

- 3.5 Objective 5 requires the natural character of the coastal environment to be restored and re-habilitated, this goes beyond the requirement of the RMA and could place an **additional financial burden on Councils**.

3.6 Relief Sought

3.6.1 *Masterton District Council submits that Objective 5 be amended, by deleting the words restored and rehabilitated, to read maintained and enhanced, which will reflect the wording of s 6 of the Resource Management Act.*

3.6.2 *That objective 8 is altered to provide for the exclusion of the public from areas surrounding or alongside public infrastructure where the security of that infrastructure could be compromised. e.g. water supply intakes and reservoirs and wastewater treatment plants.*

4.0 Energy Infrastructure and Waste 3.3

4.1 Objective 10 and policies 6 and 38 provide for the recognition and protection of regionally significant infrastructure. Policy 6 includes local authority water supply networks and water treatment plants, wastewater and stormwater networks, systems and wastewater treatment plants. It does not include territorial government infrastructure listed as strategic assets in each TA,s LTCCP.(Page 39 Vol 3 MDC's LTCCP) Territorial government assets should also be recognized and protected, in particular **Masterton Hood Aerodrome**.

4.2 It is noted that the lists of regionally significant infrastructure found throughout the PRPS do not appear to be consistent in what is listed in them.

4.3 Policy 10 provides for the promotion of small scale renewable energy generation. It is considered that there should also be encouragement for large scale renewable energy generation.

4.4 Relief Sought

4.4.1 *The Masterton District Council submits that a new policy be introduced for the recognition and protection of territorial government strategic assets as listed in their LTCCPs, or that they are incorporated into the existing policy.*

4.4.2 *That Masterton Hood Aerodrome is recognized as regionally significant.*

4.4.3 *That Policy 10 is amended to read 'Encouraging energy efficient design and large and small scale renewable energy generation'.*

5.0 Fresh Water (including public access) 3.4

5.1 The focus of this chapter appears to be to **maintain and enhance the health of aquatic ecosystems** and not to manage waterways to convey water.

5.2 It is vitally important for the economic and social wellbeing of the Masterton District that one of the purposes of waterways is to convey water and that **unnecessary cost and consents** do not hinder the process.

5.3 As you will be aware an irrigation study is underway to ultimately store water for irrigation purposes during dry summers. **It is vitally important for the economic and social wellbeing of the Masterton District that the region recognizes that waterways can be used for irrigation and/or conveyance purposes.**

5.4 Policy 11 requires, (a) as a minimum, that water quality, flows and water levels and the aquatic habitat of all water bodies are to be managed for the purpose of maintaining or enhancing aquatic ecosystems health; and (b) manage water bodies for other identified purposes. The last para of this policy should be amended to '**manage the waterbodies to prevent significant adverse effects** on the aquatic ecosystems', as opposed to setting limits.

5.5 The identified purpose should include **stormwater conveyance and land protection**, as the build-up of stream beds is presently compromising infrastructure and preventing drainage through existing culverts. This leads to **flooding and damage to private property** particularly in the urban area.

5.6 The Objectives and policies in this chapter could lead to territorial authorities having to construct a stormwater network rather than using existing waterways. The policies and objectives will also require consents to clean drains and streams and to remove old willows and poplars blocking waterways. This will add a **huge financial burden on ratepayers as well as the length of time it may take to obtain consent.**

5.7 There is also a presumption that all stormwater is a contaminant which produces an adverse effect, when this is not necessarily the case.

- 5.8 Policy 13 1st para should read:
*'Regional plans shall include policies, rules and/or methods that protect aquatic ecosystem health from **any adverse effects**.....'*
- 5.9 Policy 15 in both Clauses (a) and (b) uses the word 'promote', the MDC believes this should be changed to 'encourage and consider'.
- 5.10 Policy 16 uses the word 'promote' throughout and if this remains has the **potential to again add large on-going costs to the ratepayer**. The word 'promote' should be changed to 'encourage and consider'.
- 5.11 Policy 18 regarding the efficient use of water. The MDC is not against the efficient use of water, however there needs to be a better balance with affordability. The cost/benefit ratio is out of balance, and this policy has a potential to add **another financial burden on ratepayers**.
- 5.12 At what point does the use of water become efficient, and is there a definition of efficiency?
Perhaps efficiency should be measured against the benefit to the whole community, as opposed to the setting of volumetric standards. If efficiency standards are going to be used to allocate the resource then there will be a **financial burden on the community**.

5.13 Relief Sought

- 5.13.1 *That the objectives and policies of this Chapter be amended to provide a better balance for the use of the waterways.*
- 5.13.2 *That a policy should be included for the use of waterways to convey water.*
- 5.13.3 *That provision should be made for the maintenance of waterways to prevent flooding and damage to private property.*
- 5.13.4 *That policies 15, 16 and 18 use the word 'encourage and consider', instead of 'promote'.*
- 5.13.5 *Policy 11 (b) should be expanded to list the 'other identified purposes' which should include:*
- *the transfer and control of stormwater*
 - *protection of private property*
- 5.13.6 *That the Chapter be re-written to reflect the language and presumption of the RMA, for example avoiding remedying and mitigating adverse effects of activities on the environment.*

6.0 Historic Heritage 3.5

- 6.1 The Masterton District Council believes that the PWCDP incorporates the objectives, policies and rules to give effect to the PRPS.

7.0 Indigenous Ecosystems 3.6

- 7.1 The PWCDP contains the objectives, policies, methods and rules to meet the requirements of this chapter of the PRPS. Consultation has been carried out as part of the PWCDP process with all stakeholders in the community and will continue as part of the identification of significant areas.

- 7.2 The only difference is the PRPS uses the words '*maintained and restored*' while the PWCDP uses the words '*maintain and enhance*' which is consistent with the RMA.

7.3 Relief Sought

- 7.3.1 *The Resource Management Act uses the words 'maintenance and enhancement and this should be reflected in the PRPS by deleting the word 'restored' and replacing it with enhanced.*

8.0 Landscape 3.7

- 8.1 The characterization and identification of outstanding landscapes is already underway. The characterization is to be carried out by GWRC and the identification of outstanding landscapes will be undertaken by territorial authorities together with their communities.

- 8.2 The PRPS requires the 'enhancement' of natural landscapes. This is not a requirement of the RMA and in fact the 'enhancement' of a natural landscape will change it so that it is no longer natural.

- 8.3 The RMA does not require the protection of 'amenity landscapes.' Amenity landscapes are, as we understand the term, a second tier of landscapes, not outstanding landscapes. They could be the complete length of the eastern ranges and the plains between, or the view from a private residence of their neighbours planted garden and trees.

- 8.4 If territorial authorities consider that amenity landscapes should be protected then that is a decision for them and their community having considered the **social and economic implications of protection**.

8.5 Relief Sought

- 8.5.1 *That the words 'amenity landscapes' be deleted from Objective 17, Policy 27 and Policy 49.*

8.5.2 *That Policy 26 is deleted as it relates to 'amenity landscapes'.*

8.5.3 *That the word 'enhanced' be deleted from Policy 17 and Policy 27.*

9.0 Natural Hazards 3.8

9.1 The PWCDP contains the objectives, policies, methods and rules to meet the requirements of this chapter of the PRPS.

9.2 Land use controls on subdivision, built structures, and types of land use in areas affected by natural hazards have traditionally sat in district plans, and can be found in the PWCDP with the addition of controls on earthworks in these areas, any change to this should be carefully considered.

9.3 Relief Sought

9.3.1 *That full consultation is carried out with Masterton District Council when considering any change to the allocation of responsibilities for land use controls for natural hazards.*

10.0 Regional Form, Design and Function.

10.1 The PWCDP recognizes and provides for the objectives and policies in the PRPS.

10.2 Masterton is considered a regionally significant centre in the Wellington region and as part of the PWCDP process Masterton District has provided for two urban expansion areas and an additional industrial area to cater for the districts future needs.
These areas are located where they can make efficient use of the existing infrastructure and consolidate the existing urban area.

10.3 The plan provides for intensification of the urban area particularly the commercial and industrial areas where there is no minimum lot size, or coverage requirement. Infill of the urban residential area has been encouraged in the Masterton District for some years and this intensification close to the CBD has helped to keep the centre vibrant. At the same time consideration has been given to the amenities that people value in the residential area.

10.4 Rural subdivision has been limited in areas where it may compromise significant infrastructure, and where there are natural hazards and outstanding landscapes. New rural subdivision controls proposed have been designed to protect the rural character and amenity, and for the protection of land for primary production.

10.5 The Masterton District has not yet signed the NZ Urban Design Protocol, but after recently discussing the requirements of the protocol

can see no reason why this shouldn't happen. The protocol is very city focused.

10.6. Method 45 of the PRPS indicates that the Wellington Strategy Group will develop a planning framework for each Regional Focus Area. If Method 45, is necessary, provision should be made for territorial authorities who have a Regional Focus Area in their district to be part of the group and more **formally consulted to ensure that expectations and cost are manageable. However, each of the Wairarapa districts consulted their community on urban expansion, zoning and design during the consultation on the PWCDP Is the cost of this duplication necessary?**

10.7 Method 44 of the PRPS indicates that the Wellington Strategy Group will develop principles for rural residential use and development. Provision should be made in Method 44, implementation, for territorial authorities to be part of the group and more formally consulted. The PWCDP has been prepared after considerable discussion and consultation with the community. **Any changes to the plan as a result of these principles will be a cost to the Council. Again these matters were considered during the preparation and consultation on the PWCDP. Is the cost of this duplication necessary?**

10.8 Relief Sought

10.8.1 That consideration be given to the need for Methods 44 and 45, and if they remain then clarification as to the process for the development of these two documents. There should be a more structured input from Wairarapa TA's with some meetings held in the Wairarapa.

11.0 Resource Management with Tangata Whenua 3.10

11.1 The PWCDP recognizes and provides for the objectives and policies in the PRPS.

12.0 Soil and Minerals 3.11


12.1 The PWCDP recognizes and provides for the objectives and policies in the PRPS.

12.2³ Method 30 requires regional and district Councils to write protocols for the management of earthworks and air quality. The Council understands that Air Quality and Soil Plans for the Wellington Region are to be reviewed in the near future and believes that protocols should be agreed at this time.

12.3 Relief Sought

12.3.1 That protocols for the management of earthworks and air quality be agreed at the time Air Quality and Soil Plans for the Wellington Region

are to be reviewed, and that they be carried out in consultation with territorial authorities.

A handwritten signature in blue ink, appearing to read 'Susan Southey', written in a cursive style.

Susan Southey
District Planner
On behalf of the Masterton District Council

27 May 2009