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4th June 2009

Proposed Regional Policy Statement,
Wellington Regional Council,
Marshall House, Wakefield St
email: rps@gw.govt.nz

Wellington Regional Council Proposed Regional Policy Statement

Dear Councillors,

The Tararua Tramping Club is a long established Wellington Club with over 630 members. Our members engage in a variety of outdoor recreational activities and most of our trips are within the Wellington Region. Our members also have a general interest in and concern for the protection of the natural environment and conservation issues. Our activities and members' interests are thus directly affected by the Regional Policy Statement. We made a submission on the draft and proposed statements for the 1995 RPS.

Our comments and requests reference the Proposed Regional Policy Statement by section and page number and for simplicity refer to it "the Statement". We refer to the resource management act as the Act, or by section. Given the size of the Statement, it is inevitable items and issues appear in more than one place and have related effects elsewhere in it. Consequently we ask that you take our comments and requests to apply to all occurrences of the issues addressed and to request all consequent amendments.

We generally support the Statement and indeed would like to see it strengthened in order to ensure the sustainable management of natural and physical resources.

Yours faithfully,

Michael Taylor (Conservation Officer)

Main Issues

- (A) 3.2 Coastal Environment & 3.4 Fresh Water [pages 20 onward & 34 onward]
We fully support policies to eliminate pollution of these waters and more generally to protect the natural ecosystems.
- (B) 3.2 Coastal Environment [page 20]
We ask the Statement correctly describe the matter of national importance by inserting "and enhancement" before "of public access to".
- (C) 3.2 Coastal Environment & 3.4 Fresh Water Public Access [page 20 and 34 & 35]
Esplanade reserves, or failing that, strips, should always be taken when the Act allows, unless some more practical and useful guaranteed access is offered as an alternative. If that right is not taken up on behalf of the public, public access clearly will not be enhanced as required.
We agree that access is not always possible if access ways are not well maintained and that represents an issue in terms of this matter of national importance. We note that in many cases lesser and even no maintenance does not actually prevent access and concerns over maintenance should not count against establishing a right of access nor lead to one being removed.
- (D) 3.2 Coastal Environment & 3.4 Fresh Water Public Access [page 20 & 34]
We agree that one issue is that some legal access "is not always aligned with access that is physically possible". The Statement does not seem specifically to address this issue.
- (E) 3.6 Indigenous ecosystems [page 43]
We agree with the Statement's description of this issue and strongly support objective 16.
- (F) 3.7 Landscape [page 47]
We strongly support protecting, maintaining or enhancing the value of outstanding natural features and of landscapes which are outstanding or of significant amenity value.
- (G) Policy 52 [page 117]
This policy is not strong enough in support of the matter of national importance. The importance of enhancing public access is not simply conditional on the values of the accessed location, nor is that importance necessarily subservient to the importance of other matters which may also be important or significant under the Act. We ask for the following changes (1) replace "with:" by "with additional importance given for:" (2) replace "except where there is a need to protect:" by "and be provided in a manner compatible with any necessary protection of:". Although the explanation notes the proposed wording does not "limit other efforts to enhance access, or the range of values to which access could be enhanced", the currently proposed wording is inadequate for addressing such a matter of national importance.
- (H) 5.2 Objective 12 [page 148]
We are concerned that inadequate treatment can result in the denial of recreational access from water catchments (e.g. the comparison between access to the Hutt catchment and that to the Orongorongo catchment) in achieving such an objective. To avoid that we ask "without the exclusion of free public access" be appended to "The water catchments for public water supply are protected so that public health is safeguarded."

Additional Issues

- (I) 1.2 The purpose and content of the Regional Policy Statement [page 1]
The Statement should be, and is, doing more than just "outlining" the policies and methods required to achieve the integrated management of the region's natural and physical resources". That is not the wording the Act uses. As the very next page says 62(1)(d) & (e) require the Statement to state (not just "outline") the policies and methods (excluding rules). We ask that "outlining" be replaced by "providing" or at least be deleted.
- (J) 1.3 The resource management policy and planning framework [page 2]
We ask that "of natural and physical resources" be inserted after "sustainable management" properly to reflect the purpose of the Act 5(1).
- (K) 2.1 A sustainable region [page 7]
We ask that "only" be inserted after "but" before "in such a way" to match the requirement of the Act through the "while" which introduces 5(2)(a)(b)(c).
- (L) 3. Coastal Environment & Fresh Water [page 13 & elsewhere]
The Statement is inconsistent in its explicit inclusion of public access in headings regarding the coastal environment and fresh water. The draft made it explicit with "(including public access to and along)" in both cases in the content list but not in the actual (2.2 & 2.4) headings. The Statement has corrected that by having the (3.2 & 3.4) headings match the content list. We note that "to and along" has been dropped and although that phrase makes the issue clearer, we do not oppose that change as the wording was awkward and that detail is available indirectly from the Act. However, enclosing the requirement in parentheses tends to imply it is of comparatively low importance so we ask the parentheses around "including public access" be removed. Additionally "including public access" needs to be added to these items in the list on page 13.
- (M) Policy 2 [page 81]
As a matter of principle it would be more appropriate to put avoiding, and assuming that is impractical, reducing the amount of, discharge of pollutants (whether to land, sea or air) before taking steps to reduce the adverse effects of such pollution.
- (N) Policy 3 [page 81]
We accept that, as the explanation says, "the Resource Management Act does not preclude appropriate use and development" and so the policy cannot be stronger than to discourage "(a) new subdivision and/or development". However, almost by definition the policy can and should prevent, not simply discourage, "(b) inappropriate use". We ask that the Statement be modified to specify that.
- (O) Policy 25 & 27 [page 94 & 95]
The wording is too weak and we ask that this be strengthened by replacing "must be done with a full understanding of its value" with "must be done without adversely impacting its values". Without such strengthening objective 17 will not be achieved. That does not preclude change, it simply ensures change is compatible with identified landscape value. With the currently proposed wording, after "understanding" the values of the landscape, an activity which destroys those values can be allowed. That would mean that physical resource would be denied to future generations, contrary to the sustainable management purpose of the Act.

(P) Policy 35 [page 103]

As noted by us for (N) we ask that "to discouraging new subdivision and development, and inappropriate use, on land ..." be changed to "to discouraging new subdivision and development, and preventing inappropriate use, on land". We note the explanation [page 104] actually says it is "to ensure that change is carefully considered and is **appropriate** ...".