

Stuart Kinnear Consultancy Limited

PLANNING AND RESOURCE MANAGEMENT CONSULTANTS

Stuart R Kinnear FNZIS, MNZPI, MRSNZ - Director

10 Waimarama Grove, UPPER HUTT 5018 - Phone (04) 526 6763 / 526 7875 Fax (04) 526 6793

Email: kinnears@xtra.co.nz Mobile 0274 469086

FACSIMILE MESSAGE FROM (04) 526 6793

DATE: 7 June 2009

TO: Wellington Regional Council

FAX: 385 6960

SUBJECT: Proposed Regional Policy Statement

NUMBER OF PAGES (INCLUDING THIS SHEET): 4.

If you do not receive all pages please phone (04) 526 6763 or (04) 526 7875

The information contained in this facsimile is privileged and confidential. If the reader of this message is not the intended recipient, you are notified that any use, dissemination or reproduction of this message is prohibited. If you have received this message in error please notify the sender immediately.

Submission on the Proposed Regional Policy Statement from J and M McGuinness, Flat Point Station, Carterton follows.

Please contact the undersigned if all pages are not received.

The original has been posted.

Yours faithfully



Stuart Kinnear

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

Pursuant to Clause 6 of the first Schedule and S79 of the Resource Management Act 1991

To: Greater Wellington Regional Council
PO Box 11646
Wellington 6142
Fax (04) 385 6960

Full name of submitters: John Charles and Edith Mary McGuinness

Postal address and
Address for Service: Flat Point Station
Private Bag 416
MASTERTON 5840

Telephone: (06) 372 7527

Facsimile: (06) 372 7822

Contact person: John McGuinness

Address and telephone: As above

Submission

1. The specific part of the proposed Regional Policy Statement that our submission relates to is Policy 15 and its explanation. We are opposed to Policy 15 as notified and wish to have it amended.
2. Our submission is that part (b) of Policy 15 is not clear, could be subject to varying interpretations, and has not been properly evaluated pursuant to section 32 of the Resource Management Act 1991.

We are opposed to Policy 15 if it will be used to promote collective sewage treatment systems to the exclusion of individual on-site systems which are equally capable of delivering satisfactory sewage treatment and disposal outcomes.

The wording of the explanation indicates one apparent benefit of a collective system but does not include reference to the inefficiencies of such systems which can occur through slow uptake and difficulty in monitoring performance and misuse.

We are not able to be determined from the Policy what form the required "promotion" will take. In our estimation the earliest that this determination will be able to be made is when the changes to the relevant regional plans have been prepared. This adds to the uncertainty as to the effectiveness of the Policy.

It is our submission that it would be most unusual and difficult to achieve, given the

statutory requirements, if future changes to the regional plans were to *promote* the use of *collective sewage treatment systems*, to the exclusion of all other methods of sewage treatment and disposal. The means of *promotion* eventually adopted in the Regional Plan could be through education, advocacy, incentives, direct intervention, or regulatory means. In our submission the appropriate time to explore these options will be when the changes to the regional plans are being prepared when a section 32 evaluation is required.

It is our submission that the reference in the policy to a particular type of sewage treatment system is more in the nature of a method than a policy and therefore should be deleted.

A further reason to delete the reference to *collective* sewage treatment systems is that the section 32 evaluation for Freshwater has not considered this aspect of Policy 15. It is mentioned in the description of the options for regulatory direction to regional plans on page 16 (Option 6 4.1.1), but is not included in the evaluation table 4.2, the evaluation results table 4.3, or the discussion of the options under 4.4.

In addition, and with reference to the 4.2 table of the Freshwater section 32 evaluation (page 21), it is our submission that the stated benefit of making decisions on a case by case basis for receiving environments would be lost if collective systems were promoted to the exclusion of alternatives.

It is our submission that Policy 15 will be improved as to certainty by the deletion of references to *collective* systems, but without detriment to its efficiency and effectiveness and its ability to achieve Freshwater Objective 12.

Systems for the treatment and discharge of sewage to land should be evaluated on their ability to deliver appropriate standards of effluent, measured against stated criteria, in the particular circumstances of the site or sites concerned. It is our submission that Policy 15, amended as we have requested, will achieve that.

3. We wish Greater Wellington to make the following decision:

Amend Policy 15 by deleting the word "collective" from part (b) and by deleting the second paragraph of the explanation so that the Policy and explanation would read:

Policy 15: Promoting discharges to land – regional plans

Regional plans shall include policies, rules and/or methods that:

- (a) promote discharges of human and/or animal waste to land rather than water, particularly discharges of sewage; and*
- (b) promote the use of sewage treatment systems that discharge to land while maintaining groundwater quality and soil health.*

Explanation

Well managed land-based discharges can avoid adverse effects on water bodies, including degradation of the mauri of water bodies, that results from waste, particularly human waste (however well treated), being put into surface water instead of being returned to the land.

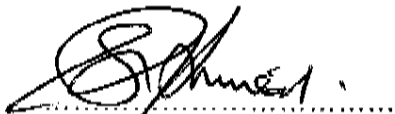
The quality at which groundwater is maintained will be determined by water quality standards in regional plans, as directed by policy 11.

Soil health in the context of this policy refers to the ability of soil to function so that plant and animal productivity is sustained, groundwater flows are maintained and human health and habitation is supported. Public health risk will need to be considered when rules are developed in regional plans.

4. We do wish to be heard in support of our submission
5. If others make a similar submission, we will consider presenting a joint case with them at a hearing.

Signed

John and Mary McGuinness
by their duly authorised agent



Stuart Kinnear

Date: 7 June 2009