
SUBMISSION ON GREATER WELLINGTON REGIONAL COUNCIL REVIEW OF THE REGIONAL POLICY STATEMENT

1. Purpose of Report

This report proposes that Wellington City Council make a submission on the proposed review of the Regional Policy Statement (RPS) by Greater Wellington Regional Council (GWRC).

2. Executive Summary

The Regional Policy Statement was adopted by GWRC in 1995 and is now due for review. A discussion paper has been released asking for feedback on the scope and content of the review. Submissions close on 30 June.

The draft submission outlines a range of issues where the Council considers the RPS should be strengthened to provide the necessary integrated management of the region. In particular it is considered essential that the RPS gives effect to a number of the elements of the draft Wellington Regional Strategy (WRS) dealing with urban form and development.

3. Recommendations

It is recommended that the Committee:

- 1. Receive the information.*
- 2. Endorse the submission, attached as Appendix 1, to be forwarded to the Greater Wellington Regional Council.*
- 3. Delegate to the Mayor and Chief Executive the authority to approve minor drafting changes.*

4. Background

The Resource Management Act 1991 requires each regional council to prepare a regional policy statement to achieve the purpose of the Act by providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region.

The current RPS was adopted by GWRC in 1995 and is now due for review under the Act. The GWRC have released a discussion document which reviews the achievements of the current RPS and seeks feedback on the scope and content of the review. The deadline for submissions is 30 June.

The GWRC is a key partner with Wellington City Council and the other territorial authorities in the development of the WRS. A draft WRS is due to be released for public consultation later this year. Joint work is currently underway on a number of workstreams including: effective leadership and partnerships; quality regional form and systems; and investment in increasing exports.

5. Discussion

The attached submission (Appendix 1) outlines a range of issues where the Council considers the RPS should be strengthened to provide the necessary integrated management of the region. In particular it is considered essential that the RPS gives effect to a number of the elements of the draft Wellington Regional Strategy dealing with urban form and development. The role of the RPS in supporting the Wellington Regional Strategy and providing clear statutory policy guidance to ensure integrated management of our urban systems at a regional level is critical to ensuring that our region remains internationally competitive and provides a high quality of life to our residents. Despite the importance that the Council has given to urban issues in Wellington City, it has to be understood that it is not possible for the Council to manage these issues in isolation, given its position as part of a much larger metropolitan area and the interconnections and interrelationships that exist between one part of the region and another.

The current RPS does not provide any meaningful guidance on built environment and infrastructure issues, and the GWRC discussion paper notes that “the role of the Regional Policy Statement in maintaining or enhancing the quality of our urban environments, managing the region’s form, and addressing the effects of urban activities and transportation has been minimal”. The emerging draft Wellington Regional Strategy now provides both the opportunity and impetus to address these issues more fully and meaningfully.

The current RPS also lacks the necessary integration across the various issues and policies. For instance, the structure of the current document means that insufficient correlation has been made between the desire to reduce demand for energy or water and the region’s urban form.

The attached submission also outlines a number of other areas where the RPS should be strengthened. Many of these issues relate to:

- (a) achieving regional consistency
 - for instance consistent standards for regional infrastructure.
- (b) providing an appropriate regional context for district plan policies
 - for instance regional landscape categorisation and identification of regionally outstanding landscapes and management of urban sprawl.
- (c) providing clear direction on regional priorities
 - for instance the need to move toward increased use of renewable energy and managing the demand for transport.

The approach proposed in the submission would be consistent with the direction already adopted by this Council and is not expected to lead to any significant additional requirements for Council.

6. Conclusion

The role of the Regional Policy Statement in providing clear statutory policies will be critical to the achievement of the Wellington Regional Strategy and integrated management of the region.

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Supporting Information

1) Strategic Fit / Strategic Outcome

The submission closely reflects and supports the Council's draft LTCCP and its strategic vision.

2) LTCCP/Annual Plan reference and long term financial impact

No financial implications.

3) Treaty of Waitangi considerations

No Treaty of Waitangi implications.

4) Decision-Making

This is not a significant decision – it is a submission prepared as part of a process under the Resource Management Act 1991.

5) Consultation

a) General Consultation

This is part of a consultative process under the Resource Management Act. Council is not required to consult on this matter.

b) Consultation with Maori

This is part of a consultative process under the Resource Management Act. Council is not required to consult on this matter.

6) Legal Implications

There are no legal implications.

7) Consistency with existing policy

This report is consistent with Council policy.

SUBMISSION

**Greater Wellington Regional Council
Review of the Regional Policy Statement**

June 2006

Introduction

Wellington City Council (WCC) welcomes the opportunity to make a submission on the Greater Wellington Regional Council's (GWRC) Review of the Regional Policy Statement (RPS). The RPS is a critical document for the long-term future development and management of the region.

This submission focuses on the need to strengthen the policy framework for built environment issues, including giving effect to the Wellington Regional Strategy, as well as the need to strengthen other policies to achieve integrated management of the region.

Context

All the Councils in the region have been working collaboratively toward the development of a non-statutory Wellington Regional Strategy (WRS). This strategy will form an important joint statement of approach to a range of strategic land use, economic development and governance issues. The RPS will form an important mechanism to give statutory effect to key elements of the WRS.

One of the driving forces behind the development of the WRS has been that whilst individual territorial authorities clearly have the lead role in managing the effects of land uses under the RMA, there is a need to effectively manage strategic urban form and development issues across the larger metropolitan area of Wellington and its regional hinterland. Whatever the final shape of the WRS, this rationale for regional guidance and integrated management remains a primary driver for the review of the RPS.

Evidence from other OECD countries is that the key competitiveness factors for city-regions are centred on four areas: economic structure and support base; quality of infrastructure; governance and leadership; and quality of life and urban environment. Influencing the spatial shape of cities is a fundamental requirement to developing an innovation-led economy, and good urban form provides an optimal environment for business to flourish as well as more efficient use of infrastructure. Strong regional leadership on all these issues is needed utilising the individual implementation tools that each local government has at its disposal – including the RPS.

The Current RPS

The Council concurs with the views expressed in the discussion document that “the role of the Regional Policy Statement in maintaining or enhancing the quality of our urban environments, managing the region’s form, and addressing the effects of urban activities and transportation has been minimal”.

The existing Built Environment and Transportation chapter of the RPS provides little or no direction to Territorial Authorities (TAs) or private investors on what is required to achieve its intent. At all levels the Statement is deficient:

- the objectives are too broad and focus on effects without considering the need to provide integrated management of urban development;
- the policies provide no specific direction to TAs and read more as objectives. They provide no guidance to district plans on what is required to implement the broad intent;
- the methods provide no direction to TAs. In several instances the method of implementation is simply: “District plans would be an appropriate means of

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implementing the policy”. The only methods with any clear direction are those that relate to action to be taken by GWRC itself.

- The anticipated environmental results are simply restatements of objectives with no clear way of being measured.

In terms of overall structure, the intent of linking together the built environment and transport issues is supported. Transport infrastructure both drives and is driven by urban form more than any other type of infrastructure. The current RPS doesn't however provide clear linkages to other 'environmental' issues, many of which are largely consequences of urban development. How the region is developed, the shape of this development and the way it is designed will all have significant impacts on the demand for the region's resources. The focus of the current RPS on attempting to manage the consequences of development without managing development itself issues, can only be a partially effective strategy and is likely to result in increased overall costs. Land development can and does adversely impact on the region's environmental qualities. In particular the cumulative impact of development over the long-term continues to place pressure on natural resources, which if not managed in an integrated manner, can eventually lead to the gradual diminishing of environmental quality. Impacts include:

- Loss of valued ecological resources through clearance;
- Earthworks and disturbance result in erosion and sedimentation;
- Increased runoff, leading to flooding, erosion, and contamination of receiving environments;
- Pressure on capacity of infrastructure with increased pollution events;
- Impacts on water quality and quantity;
- Impacts on air emissions and air quality;
- Loss of prime agricultural land;
- Impacts on cultural places and values including landscape.

Recent Legislation

The discussion document rightly notes the substantial amount of legislation enacted since the current RPS was prepared. It is considered essential that the GWRC are proactive in undertaking the review of the RPS starting afresh from this new context. The recent legislation has encouraged a wider view of the role of regional councils. The Local Government Act 2002 provides for the purpose of local government to “promote the social, economic, environmental, and cultural well-being of communities, in the present and for the future” and sets out a range of tools to enable this role to be fulfilled. Recent changes to the Resource Management Act 1991 have reinforced the role of regional councils in delivering 'integrated management'. Section 30(gb) now provides for a regional council to have the additional function of “the strategic integration of infrastructure with land use through objectives, policies and methods”.

Wellington City Council Strategic Direction

The Wellington City Council has identified urban management issues as its five highest strategic priorities for the next 3 years, including: improving residential infill management; achieving high quality urban design; concentrating development in a growth spine; developing and implementing the Wellington Regional Strategy; and protecting and enhancing local sense of place. The WCC draft ten-year plan also places a strong emphasis on managing urban development and economic development. The RPS needs to support this direction through appropriate regional objectives, policies and methods and to ensure greater consistency across the region.

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The Council's draft Urban Development Strategy includes in its 3 year priorities:

- Improving the management of residential infill development, including potential for more targeted infill across the city
- Improve the quality of urban design, including through place-specific projects, improved management of heritage buildings and better regulation
- Set in place a plan for the 50 year 'growth spine' along the transport corridor from Johnsonville to the Airport

The Council's Transport Strategy includes as its 3 year priorities:

- Improving the performance of the city transport system through travel demand management
- Facilitate investment in the city state highway network
- Improve the performance of the city's passenger transport network through bus priority measures
- Work to resolve conflict between access to the port and access to the central area and beyond

The Council's Environmental Strategy includes as its 3 year priorities:

- Increasing the Council's promotion of water and energy efficiency and conservation, energy security, and the use of renewable energy sources, and taking a more active leadership role in these areas
- Increasing the Council's efforts to improve the protection of streams
- Developing a coherent plan to address biodiversity issues, including removing and replacing hazardous trees
- Strengthening the Council's partnerships with stakeholders to increase environmental awareness, community participation, and the achievement of environmental goals.

Implementing the Wellington Regional Strategy

The Council believes that several action areas of the WRS will need to be at least partly implemented or supported through the RPS. These may include:

- Managing urban expansion and avoiding urban sprawl
- Achieving quality urban design
- Managing the demand for transport
- Supporting necessary transport connections and improvements such as improved east/west connections and improving reliability of north/south connections to create a balanced transport network
- Supporting economic growth and innovation
- Developing and maintaining a regional information base and dataset
- Identifying and mapping the region's public open space network, identifying gaps and opportunities and improving integration and management
- Identifying key change areas where co-ordinated planning frameworks are to be prepared
- Identifying sub-regional centres and a process for developing a centre vision and development strategy
- Management of large-format retail land uses
- Developing an investment programme for major infrastructure
- Facilitation of residential intensification in appropriate areas

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- Achieving more affordable housing
- A regional framework to guide the release of land and development of rural–residential development
- Determining the regional priorities for infrastructure investment

Recommendations

Wellington City Council holds the view that there is a need to provide better control of growth across the region to avoid fragmented land use patterns, which may have adverse social, cultural and environmental consequences and to ensure more rational and cost-effective provision of infrastructure across the region. This is important not just for Territorial Authorities (TAs) but also network utility operators, both of whom need to plan and budget for the provision of services many years in advance of their delivery. A clear regional pattern and sequencing of development would provide improved investor confidence in Wellington as a destination of choice. Matching infrastructure provision to future development will also ensure more efficient utilisation of the infrastructure itself.

The RPS also needs to be strengthened to provide:

- regional consistency, including in terms of the quality of development and infrastructure provision;
- an appropriate regional context for district plan policies and rules;
- clear direction on regional priorities.

Outlined below are a number of more specific areas which the Council believes should be considered as part of the RPS review. These include both structural and topic issues:

Structure and Role:

1. The RPS should provide the statutory implementation mechanism to give effect to all regional-level land use and transport issues identified as part of the Wellington Regional Strategy.
2. The RPS should be the statutory instrument through which integrated management of the region's resources comes together. This should include integration across a number of different legislative instruments, including the Regional Land Transport Strategy (RLTS) (under the Land Transport Management Act 2003), the Community Outcomes Process and the LTCCP (under the Local Government Act 2002) as well as the RMA. The RPS should provide strategic policy direction and guidance to the RLTS, as well as methods to assist in its implementation.
3. The RPS methods should provide specific and clear direction to TAs on what policies are to be achieved through District Plans or through consent processes or other methods.
4. Built Environment and Transport issues should continue to be closely linked in the reviewed RPS, however better linkages also need to be made between built environment and other environment issues on which it has a significant impact.

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Built Environment:

5. The objectives of the RPS should reflect the key WRS principles which include:
 - Reinforce compact corridor form
 - Mature sub-regional centres and reinforce CBD
 - Strengthen green belts and open space corridors
 - Integrate transport network with urban form
 - Ensure suitable employment land is available
 - Improve housing choice and affordability
 - Ensure efficient use of land and infrastructure
 - Improve the quality of development.
6. The RPS should provide guidance on the appropriate timing, location and extent of growth in the region, as outlined in the WRS.
7. Where necessary, clear strong policies should be included to restrict further growth where this would compromise regional objectives as outlined in the WRS. (Examples of where this may apply include Pauatahanui and north of Waikanae).
8. The RPS should outline clear policies to achieve quality urban design, including the principles which need to be achieved, and outline the range of methods including what needs to be identified in district plans and the use of other methods.
9. Policies should require all new major greenfield growth areas to be subject to a structure planning exercise that identifies how the land will be developed to support the regional objectives.
10. Policies should ensure that development on the urban fringes is designed in such a way that future long-term urbanisation is not jeopardised.
11. Consideration should be given to using controls such as a minimum density level and mix for all new urban developments to maximise land utilisation and to support transport objectives.
12. Guidance should be provided on the appropriate mix of greenfield, brownfield and infill development across the region and each sub-regional area.
13. Policies should address the management of development in rural areas.
14. Policies should address the impacts of transport decisions on urban form and sustainable land use patterns.

Transport Infrastructure:

15. Policies should address strategic and cross-boundary issues associated with transport infrastructure provision.
16. The RPS should provide a strategic regional direction to guide District Plan provisions and ensure a strategic roading hierarchy.
17. The RPS should provide guidance on the necessary infrastructure programme to support a compact urban form and implement the RLTS.
18. Policies should ensure that the transport network is designed to support a compact sustainable urban form by linking and supporting existing urban centres.
19. Policies should ensure that urban form is designed to support transport objectives to increase active mode share (use of passenger transport, walking and cycling) and reduce the need for private vehicle travel.
20. Policies should address the adverse impacts of transport systems on natural and built environments both in terms of efficient use of land resource and ecological impacts.
21. Policies should identify the strategic hierarchy and function of various roads in the transport system, linked to the RLTS.

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22. Transport policies should clearly link to energy policies, including consideration of the impacts of peak oil (or the end of cheap oil) on transport systems and the strategies to mitigate this. Links should also be made to climate change impacts from transport emissions.

Other Infrastructure:

23. The RPS should provide guidance on the necessary infrastructure programme to support the planned growth. This may include a schedule of major infrastructure requirements and appropriate sequencing.
24. Policies should ensure that the transport network is designed to support a compact sustainable urban form.
25. Policies should ensure that urban form is designed to support transport objectives to increase use of passenger transport, walking and cycling and reduce the need for private vehicle travel.

Air Quality:

26. The RPS should continue to provide a framework for testing air quality in the region and addressing problem areas, including mobile sources such as automobiles and diesel buses.
27. Related to the issue of odours raised in 5.2.3 of the discussion document, Wellington City Council has found the RMA to provide only limited success as a vehicle for effectively dealing with odour issues.

Fresh Water:

28. Policies should ensure that desired outcomes or standards are identified for the water quality in fresh water bodies and marine waters.
29. Guidance is required on the regional management of potable water in the region with objectives that set priorities and encourage sustainable alternatives to be investigated.
30. Streams and the ecological health they support should be protected from unnecessary piping, from fill and runoff related to earthworks, and from other pollution from land-based sources.
31. The RPS and the Regional Fresh Water Plan should give greater attention and protection to urban streams than it does currently, including a framework for joint action on non-point source pollution.

Soils:

32. It is our understanding that the GWRC's Aggregate Plan dates to 1978 and may need revision to adequately provide for quarry operation and management. The supply of aggregate is an important regional issue.
33. The RPS should promote the control of erosion arising from earthworks (including earthworks related to transportation infrastructure)

Ecosystems and Biodiversity:

34. Methods should include guidance on how biodiversity can be protected on privately owned land, and pest management strategies.

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Coastal Environment:

35. Guidance should be provided on the likely effects of climate change and sea level rise, and possible adaptation mechanisms to inform TA management of coastal land use.
36. Further direction should be provided on appropriate management of coastal land uses and the environment.

Landscape and Heritage:

37. The RPS should provide a more consistent understanding of regionally outstanding landscapes and how landscape character should be managed.
38. Methods should include the development of a regional landscape categorisation study.

Natural Hazards:

39. Guidance should be provided on sustainable flood management methods.

Climate Change:

40. Clear links need to be made between climate change and other issues like natural hazards and energy.
41. Guidance to TAs on available mitigation and adaptation options would be useful, including the Communities for Climate Protection programme and ways to manage coastal development given the likelihood of sea level rise.

Energy:

42. The RPS should support the further development and use of renewable power sources, including the region's ample wind resource as well as possibilities for solar heating.
43. Energy efficiency and conservation should be promoted.
44. Wellington City Council's Plan Change 32 (Renewable Energy) could be explored as a possible model for other TAs in the region.

Waste Management and Hazardous Substances

45. Clear regional direction is needed to determine the outcomes required for the management of solid waste in the region.
46. Policies should facilitate uniform waste disposal and recycling options.