

Our Ref NZ0109056
Contact Jenny Grimmett

5 June 2009

Freepost 118112
Proposed Regional Policy Statement
Greater Wellington Regional Council
142 Wakefield Street
PO Box 11-646
WELLINGTON 6142

Attention: Mr Tim Porteous, Acting Manager, Environmental Policy

Dear Sir

SUBMISSION ON PROPOSED REGIONAL POLICY STATEMENT

Thank you for the opportunity to submit on the Proposed Regional Policy Statement (PRPS). Our company made comments when it was originally issued for comment in draft form in 2008. The current version was circulated with a formal request for submissions 24 March 2009, with the submission period being extended to 8 June 2009, allowing us a chance to provide input.

We have recently been required to formally refer to the document in applications for consent to the Regional Council so had a good opportunity to review how it works in practice rather than just reading it "cold" and making comments on that basis.

Our observations are that the Proposed RPS claims to take a more targeted and directive approach than the Operative RPS, and this is considered by the authors of the PRPS to be more likely to achieve the outcomes sought by the Regional Council. We note that the document is divided into sections, clearly pointing out which objectives and policies relate to identified issues, and who has responsibility for addressing these. We found this most helpful in identifying which matters (through policies) needs to be addressed at the time of assessing a resource consent application.

Our only concern with this is that the sections which appear to be addressed at local authority functions seem to want to force updates of existing District and/or Greater Wellington Regional Plans. Emphasis seems to be placed on greater controls on the environmental effects of development. While this is laudable, it does not provide clear guidance to the reader what they can expect in the future when applying for resource consents or what might still be permitted under future plans. We envisage that controls on activities at the time of writing could change, with timing being dependent on how long it takes authorities to update their own plans. We would assume this will be a long term process, as any updates to local authority plans require a public submission process and hearings. Our clients would have to submit on these plan changes to have any input on the outcomes. It is therefore difficult for us to make comment further on the mandates of the PRPS in this respect, as it does not reflect what the content of future plans will be.

Yours faithfully
Jenny Grimmett
Senior Resource Management Consultant
for **Cardno TCB**



Shaping the Future

Cardno TCB

4 Frankmoore Avenue
Johnsonville, Wellington

PO Box 13 142
Wellington 6440
New Zealand

Telephone: 04 478 0342
Facsimile: 04 478 9416
International: +64 4 478 0342

Email: tcb@cardno.co.nz
Web: www.cardno.co.nz

New Zealand Offices

Wellington

Hawkes Bay

Wairarapa

Taupo

Christchurch

