

BEFORE THE MANAWATU-WANGANUI REGIONAL COUNCIL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of hearings of submissions to the Proposed One Plan (June 2009 hearing)

VERBAL SUBMISSION BY
PAULINE LOVE
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2 JULY 2009

INTRODUCTION

1. Ruapehu District Council thanks the Hearings Panel for the opportunity to be heard today. My name is Pauline Love and with me today are Anne-Marie Westcott, Team Leader for Environment and Liezel Jahnke, Policy Planner. I have been working in policy and planning at RDC for just over five years, the last two years as Team Leader for Strategic Development, and I hold a Masters degree in Public Policy from Victoria University.
2. RDC supports the evidence already presented on behalf of the TA collective and wishes to make a number of additional points in this brief verbal submission.

CHAPTER 3: INFRASTRUCTURE, ENERGY AND WASTE

Policy 3-1

3. The policy framework relating to infrastructure is vitally important in supporting RDC and other TAs to fulfil their statutory responsibilities under the Local Government Act, Resource Management Act, Public Health Act and other legislation. Council is in full support of the Proposed One Plan RPS identifying and recognizing the importance of infrastructure in supporting our communities.
4. Council does not believe that the recommended changes to Pol 3-1 provide the relief sought in our submission, and do not address our concerns about the appropriate recognition of community infrastructure of regional importance. Key areas covered by this verbal submission are:
 - Council believes clarification of priorities of different infrastructure, or lack thereof, is needed in Pol 3-1.
 - Council is not satisfied that some community infrastructure is adequately described, when compared to, for example, electricity infrastructure.
 - A number of gaps remain in Pol 3-1 with regard to clearly recognizing the importance of infrastructure provided by TAs – including local roads, solid waste infrastructure and stormwater drainage systems. Pol 3-1 does not fully cover the “Life Lines” of communities that TAs and Regional Council developed in the 2005 project, also referred to in Braden Austin’s evidence.

I will now briefly discuss these points in further detail.

Clarification of priorities

5. RDC believes the structure of Pol 3-1 could be interpreted as listing infrastructure in order of importance or priority. This point was raised with Horizons officers during a pre-hearing meeting where RDC requested wording at the top of Pol 3-1 (a) include words to the effect of "...(*listed in no particular order of priority*)..." which was informally agreed to at the time but has not been provided for in the revised Pol 3-1.
2. Other than a discussion of the importance of renewable energy to the Region, there appears to be no specific explanation of the rejection of this submission point in the evaluation section of the July 2008 Planner's report (refer pages 26 and 42-44),
3. An example of the concern created by the lack of clear priorities is in relation to the number of hydro electrical facilities in the Ruapehu District. When in the same area as community infrastructure, both users compete for the same available water resources. Community assets, such as water supplies, are for the public benefit and should not be potentially jeopardised by hydro-electric power systems being priority infrastructure.
4. Pre-hearing caucusing between Horizons Officers and the TA collective is also addressing the issue of priority water allocation for community water supplies as part of Chapter 15, in preparation for the water hearing in late 2009. To be consistent with this approach, RDC submits that Pol 3-1 needs to be clear about priorities, or lack thereof, for important infrastructure, to ensure certainty and clarity for Council and our communities.

Stormwater drainage systems

5. RDC submits that stormwater drainage systems must be recognised under Pol 3-1. In the track changes version of Chapter 3 dated August 2008, a change was recommended to include 'flood and drainage' systems under Pol 3-1(a). The rationale for this recommendation can be found on page 112 of the Planning Evidence and recommendations Report of David Armour, dated July 2008.
6. In the supplementary report of Barry Gilliland dated 20 May 2009, this earlier recommendation is changed as per paras 81-83 on page 15, stating that drainage systems do not fall within the RMA definition of infrastructure. RDC objects to this point, as 'a drainage or sewerage system' is included under Section 2 (1) Para (f) of the RMA. If the rationale for omitting drainage systems in the supplementary report is to be followed, sewerage systems should also be omitted, yet has been included in the revised Pol 3-1.
7. In addition to drainage systems being covered by the RMA definition of infrastructure, RDC believes the importance of such systems in mitigating environmental effects and ensuring public health and wellbeing in the Region warrants its inclusion under Pol 3-1(a).

Solid Waste infrastructure

8. Further to the evidence of Braden Austin, RDC believes the omission of solid waste infrastructure in the revised Pol 3-1, while it is not covered by the RMA infrastructure definition, is a significant oversight. This may impact on the ability for TAs to provide effective solid waste management if the regulatory regime of the One Plan is applied without recognition of this infrastructure's importance.
9. RDC believes that the importance of solid waste management, including waste minimisation, has grown significantly since the early 1990's when the RMA was first introduced and this should be recognized in the Proposed One Plan.
10. The solid waste services and infrastructure include the collection of both refuse, and material for recycling from the community, processing plants including composting, cleanfills, transfer stations and resource recovery facilities, which are owned or

administered by TAs. RDC submits that Pol 3-1 be amended to include this type of infrastructure.

11. RDC also wishes to refer to the National Asset Management Steering Group (NAMS) International Infrastructure Management Manual, which is the accepted industry guide for New Zealand and Australia and includes both drainage and solid waste assets as key components of local government infrastructure.

District roads

12. Pol 3-1 identifies infrastructure of regional or national importance, but specifically excludes the district roading networks, as the Regional Land Transport Strategy excludes most roads within the Ruapehu District. Council submits that the TA's roading networks are vital to the functioning of the Region and must be acknowledged as such in Pol 3-1. In the Ruapehu District, several local district roads assist in providing access to the Tongariro and Whanganui national parks which are both of significant regional and national value and major tourist attractions supporting the local economy.

CHAPTERS 8 AND 14 – AIR

13. RDC wishes to comment on the inclusion of the Taumarunui airshed in the Proposed One Plan. Since our original submission in 2007 Council has investigated the situation with the airshed and accepts that the gazetted designation of the airshed cannot be simply removed by Regional Council. Following several other submissions on the lack of progress with the airshed since it was gazetted in 2005, Regional Council has recently agreed to an air quality monitoring program in Taumarunui to start in mid 2009. Horizons was a partner in the Taumarunui Warm Homes Air Quality Project aimed at cleaner home heating. This ceased in July 2008 due to a loss of central government funding and has not been replaced by any other such an initiative.
14. We wish to note the lack of action to date towards improving the condition of the airshed in line with the National Environmental Standard for Ambient Air Quality. The NES states a deadline of September 2013 for improvement in airsheds, and the Proposed One Plan refers to strategies aimed at reducing fine particle or PM10 levels to be established by 2008 as per Pol 8-5 (b). Council is not aware that such a strategy has been developed and believes this timeline should be amended accordingly in the Proposed One Plan.
15. The Propose One Plan incorporates the regulatory requirements of the NES into the policy and rule framework relating to air discharge consents, yet there is little evidence of the improvement strategy or actions required to meet the 2013 deadline. If the Taumarunui airshed does not improve, there are potentially significant implications for industry resource users, future growth and the local economy. Council believes that implementing the regulatory framework for air discharge consents should not be done without a sound improvement strategy in place.
16. PM10 air quality monitoring will start soon in Taumarunui, but it is likely to take a few years of robust data to be able to accurately determine the condition of the airshed, and the frequency and extent of exceedances, which in turn will determine the level of improvement required to meet the NES. But during this time the 2013 deadline is getting closer and an improvement strategy needs to be implemented as soon as possible. Council is anxious to see progress from Regional Council on this matter.

This concludes RDC's verbal submission. Thank you for your attention and we are happy to take any questions.