

**13 November 2023**

**Attention:**

**Greater Wellington Regional Council  
100 Cuba Street  
Te Aro  
Wellington 6011**

**Wellington City Council Submission on Proposed Change 1 to the Regional Policy Statement for the Wellington Region**

Thank you for the opportunity to make a submission on Variation 1 to Proposed Regional Policy Statement Change 1 for the Wellington Region.

Overall, Wellington City Council (WCC) is supportive of the proposed Variation and the visions for freshwater that are seeking to be inserted in the Regional Policy Statement (RPS).

Alignment of the RPS and WCC's approach to urban growth and protection of the environment is crucial. The need for freshwater improvements is well known and the intent in the RPS is positive. The freshwater visions will be challenging to achieve, requiring significant investment by Central Government, Councils and private developers. This is at a time when many Territorial Authorities in the region, including WCC, have funding constraints that limit our opportunity to make swift changes. The achievement of the visions will take time and a concerted effort.

Yours sincerely,

**Barbara McKerrow**

Chief Executive  
Wellington City Council

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## **Submission on Proposed Change 1 to the Regional Policy Statement for the Wellington Region**

WCC generally supports the proposed variation to the RPS. It sets out a bold and aspirational vision for freshwater outcomes in Te Awarua-o-Porirua and Te Whanganui-a-Tara catchments (which are both partially within the Wellington City Council's jurisdiction).

WCC recognises that significant changes to approaches for managing land-use and investment in infrastructure will be required to achieve the freshwater visions. WCC supports the long-term intent of the freshwater visions and notes that for practical reasons, it will take many decades to progress towards achieving the aspirational outcomes proposed.

WCC wish to be heard in support of our submission at a hearing and would consider presenting a joint case at the hearing with others who make a similar submission.

WCC does not consider that it could gain an advantage in trade competition through this submission.

### **Relevant provisions subject to this submission:**

1. Objective TAP: Long-term freshwater vision for Te Awarua-o-Porirua
2. Objective TWT: Long-term freshwater vision for Te Whanganui-a-Tara

### **Support/Oppose**

Support-in part.

### **Decision Sought:**

1. That Variation 1 to Plan Change 1 to the RPS is approved, subject to changes suggested in the relief sought below:

Note: proposed amendments are shown in **underline and bold** for additions and ~~striketrough~~ for deletions.

#### **Objective TAP: Long-term freshwater vision for Te Awarua-o-Porirua:**

*By the year 2100 Te Awarua-o-Porirua harbour, awa, wetlands, groundwater, estuaries and coast are healthy, wai ora, accessible, sustainable for future generations, and:*

1. *The practices and tikanga associated with Te Awarua-o-Porirua are revitalized and protected; and*

2. *Mahinga kai are abundant, healthy, diverse and can be safely gathered by Ngāti Toa Rangatira and served to Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and*
3. *Have restored and healthy ecosystems that support an abundance and diversity of indigenous species, and have a natural water flow and energy that demonstrate kei te ora te mauri (the mauri of the place is intact); and*
4. *Provide for safe access for people and communities to enjoy a range of recreational activities including fishing, fostering a strong connection to these waterbodies; and*
5. *Are taken care of in partnership with Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa as kaitiaki for the mana of Te Awarua-o-Porirua as a taonga; and*
6. *Are resilient to the impacts of climate change; and*
7. *The use of water and waterways provide for social and economic use benefits, provided that such use ~~does not compromise~~ **sustainably manages** the health and well-being of waterbodies and freshwater ecosystems or the take and use of water for human health needs.*

**Objective TWT: Long-term freshwater vision for Te Whanganui-a-Tara:**

*By the year 2100 a state of wai ora is achieved for Te Whanganui-a-Tara in which the harbour, rivers, lakes, wetlands, groundwater, estuaries and coast are healthy, accessible, sustainable for future generations, and:*

1. *The practices and tikanga associated with Te Whanganui-a-Tara are revitalized and protected; and*
  2. *Mahinga kai are abundant, healthy, diverse and can be safely gathered by Taranaki Whānui and Ngāti Toa Rangatira and served to Taranaki Whānui and Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and*
  3. *Have mauri/mouri that is nurtured, strengthened and able to flourish and restored natural character, have a natural water flow, and ecosystems that support an abundance and diversity of indigenous species; and*
  4. *Provide for the safe access and use of all rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of recreational activities including fishing, fostering an appreciation of and connection to these waterbodies; and*
  5. *Are taken care of in partnership with Taranaki Whānui and Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa and Taranaki Whānui that respects the mana of Te Whanganui-a-Tara and the whakapapa connection with Taranaki Whānui and Ngāti Toa Rangatira; and*
  6. *Are resilient to the impacts of climate change; and*
  7. *The use of water and waterways provide for social and economic use benefits provided that such use ~~does not compromise~~ **sustainably manages** the health and well-being of waterbodies and freshwater ecosystems or the take and use of water for human health needs.*
2. Provide further or other consequential relief as may be necessary to fully give effect to the relief sought.

**Reason:**

*Wellington City Context*

The proposed RPS visions are consistent with the Strategic Vision for Wellington ([Wellington Towards 2040: Smart Capital](#)) to be a climate-friendly, affordable, and welcoming eco-city to live for generations to come.

Collectively, WCC's Three Waters network (drinking water, wastewater and stormwater) includes 2,653 km of pipes, 65 reservoirs, 103 pump stations, three treatment plants. WCC manages the global stormwater and wastewater discharge consents for the district and is thereby responsible for managing land-use and the stormwater and wastewater networks for Wellington.

*Infrastructure*

While active steps have been taken in improving the health and well-being of the environment within the WCC district, it should be noted that WCC has practical constraints in the management of its three waters network. As the network's infrastructure ages it requires higher levels of maintenance, which is also exacerbated by earthquake damage, as well as historical pressures on water infrastructure funding and uncertainty in future legislative requirements for the management of three waters infrastructure. WCC has funding constraints that will make it difficult to achieve significant improvements to network infrastructure quickly.

*Urban Development*

Wellington is projected to need an additional 30,407 dwellings over the next 30 years to satisfy urban growth demands. This will require significant infrastructure upgrades, which will be expensive and take years to undertake. A long-term approach will be needed to renew existing assets, provide for growth and ensure enhanced water quality outcomes can be delivered. It is important that both urban growth and water quality outcomes can be achieved. In this regard, a year 2100 target for achieving the proposed objectives of Variation 1 is supported. WCC would caution against reducing the vision's timeframes, as it is unlikely to be practicably achievable, for the previous stated reasons.

*Wellington City water quality improvements*

In the meantime, WCC is already engaging in multiple statutory and non-statutory processes to achieve water quality improvements, including:

- Prioritised water infrastructure upgrades;
- Development of a Green Network Plan to deliver the many ecological, social, economic, cultural and public health benefits to the central city;
- Introduced requirements for Water Sensitive Urban Design into the WCC Proposed District Plan;

- Introduced requirements for Hydraulic Neutrality into the WCC Proposed District Plan; and
- Wellington Water (on behalf of WCC) has developed a draft stormwater management strategy.

*Proposed amendments*

WCC considers that the use of the terminology “does not compromise” is potentially inconsistent with 3.3(2)(b)&(c) of the National Policy Statement – Freshwater Management. Using “does not compromise” is potentially fraught, as it could be argued that even minor environmental effects could result in a compromising of water quality. If a literal or officious interpretation of “does not compromise” is enforced or informs future lower order Resource Management Act documents, such as the Natural Resources Plan, then this could have significant unreasonable implications for the take and use of freshwater. WCC considers that a more reasonable approach is the use of the term “sustainably manages”. WCC is open to other terminology considerations which would more readily cater for reasonable use.