

Eugene Doyle Submission to NRP PC1

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Introduction

I am a member of the Owhiro Bay Residents Association, a member of Owhiro Mai Uta Ki Tai (catchment collective), and the convenor of Te Hononga Ki Te Upoko - Wellington Catchments Collective. I was a member of the Mayoral Task Force on Three Waters and am currently a member of WCC's Environmental Reference Group.

Thanks GWRC for all the work done on the Natural Resources Plan.

I want to be part of a process that builds confidence and high levels of approval and respect for our councils, our water company and environment-related agencies.

Like many citizens I don't have the personal resources to absorb the full document.

I would like to appear in person to support this submission.

I support the NRP PC1

I support the thrust of PC1, especially the excellent work done on the Whaitua process for Porirua and Whanganui-a-Tara which PC1 seeks to support and deliver on, at least in part. Furthermore, to be successful, this regional plan change needs to be well integrated with the related functions and initiatives from the respective statutory parties, including the regional council, territorial councils and Wellington Water as the local 3-waters entity. It also requires effective community engagement.

At the bottom of this document I include a couple of submissions from others that I support in their entirety.

My submission will focus on one thing:

The need for better structures and processes that support communities, particularly catchment groups and their leaders, to participate in the oversight/scrutiny of work undertaken by Greater Wellington, the councils and the key agencies, such as Wellington Water.

Addressing the inherent power imbalance that is impeding community participation

Outgoing Minister David Clark said in 2022:

“There is an inherent power and resource imbalance between large monopolistic businesses and consumers. I propose to strengthen the consumer voice in the three waters system by enabling the regulator to require or incentivise the entities to undertake high-quality consumer engagement.”

His comments were specifically in reference to Three Waters (R.I.P) but are directly applicable to everything GWRC undertakes under the NRP.

What I would like to see achieved by this NRP PCI process

The most important thing I would like to see happen is for there to be requirements for structures and processes that enable communities - right down to individual catchment level - to participate in all issues across Te Taiao.

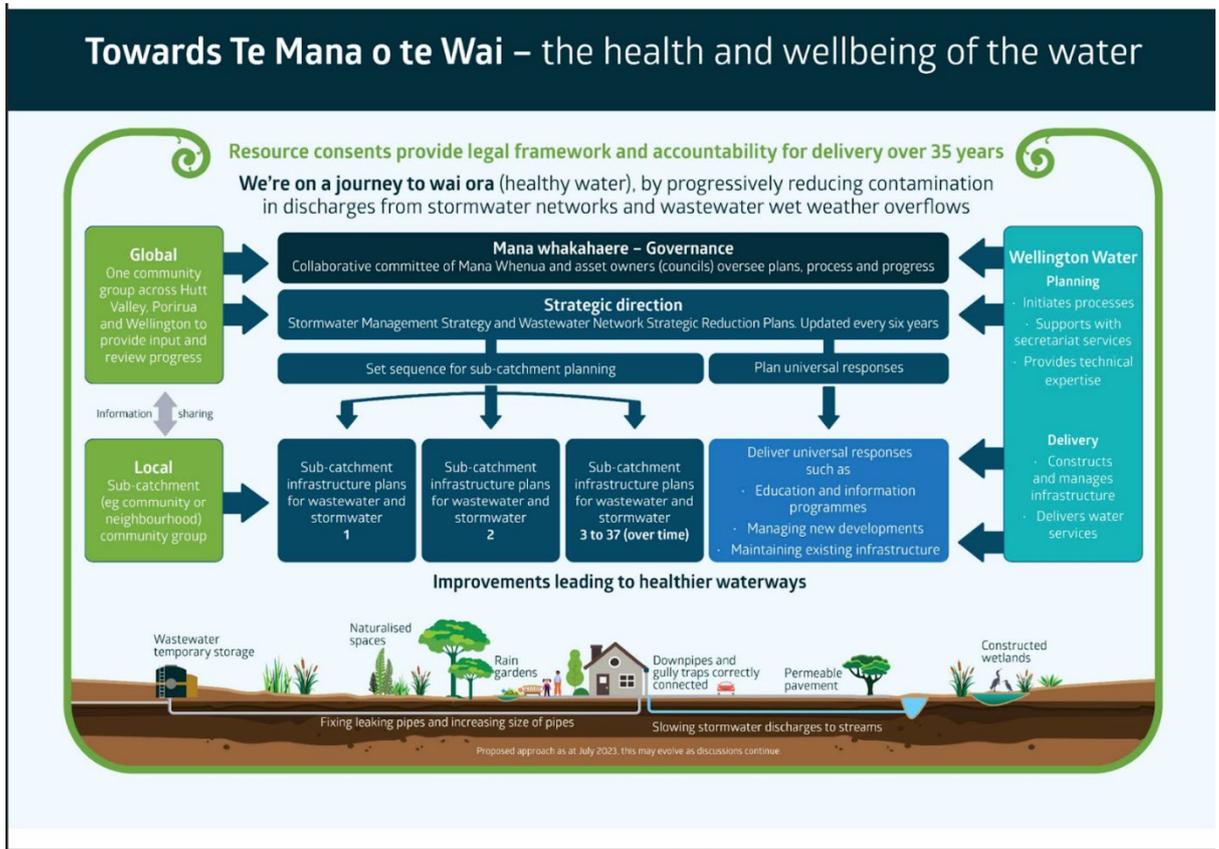
I urge you to take personal and collective responsibility to ensure that through every mechanism available, we collectively deliver structures and processes that ensure the missing sub-structure, the missing democratic foundations of our environmental infrastructure are added.

Take practical steps to expand participation

Wellington Water has shown some real leadership in setting up a structure for community participation as part of its Global Stormwater Resource Consent Application. It is a model that should be built on and expanded to aggregate multiparty work across the region. I believe this approach should form part of what GWRC undertakes as part of its NRP. Key features of the Wellington Water/Community engagement approach are:

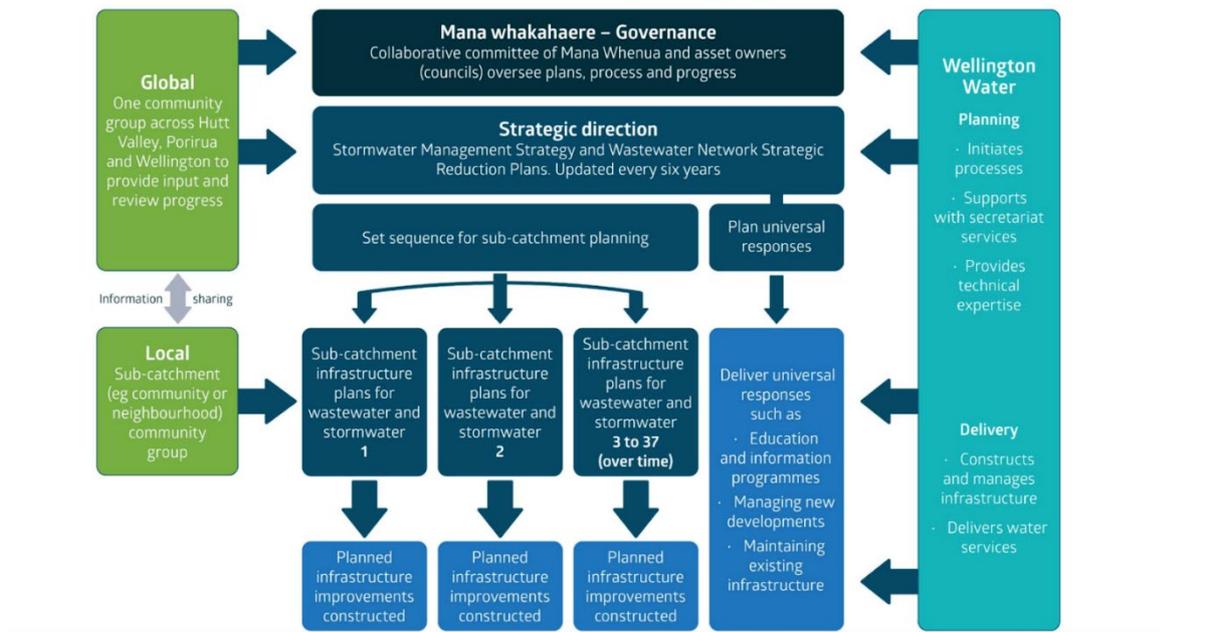
1. The development of a structure that links sub-catchment groups, creates a regional representative body for catchment communities (Global Reference Group) and provides effective linkages to those who are in positions of power. See below.
2. Individual catchment panels will feed into the regional Global Reference Group composed of community leaders, resourced and serviced by the water company. The Global Reference Group will have a formal relationship with the Senior Leadership team, asset owners and, we hope, mana whenua.
3. This will be supported by robust terms of reference and requirements around data sharing & reporting. It's a great template to build on – and I would urge the Greater Wellington Regional Council to invest time and money in supporting and expanding this important initiative.

4. A Pilot programme up and running by the beginning of 2024.



5.

A closer look at community engagement

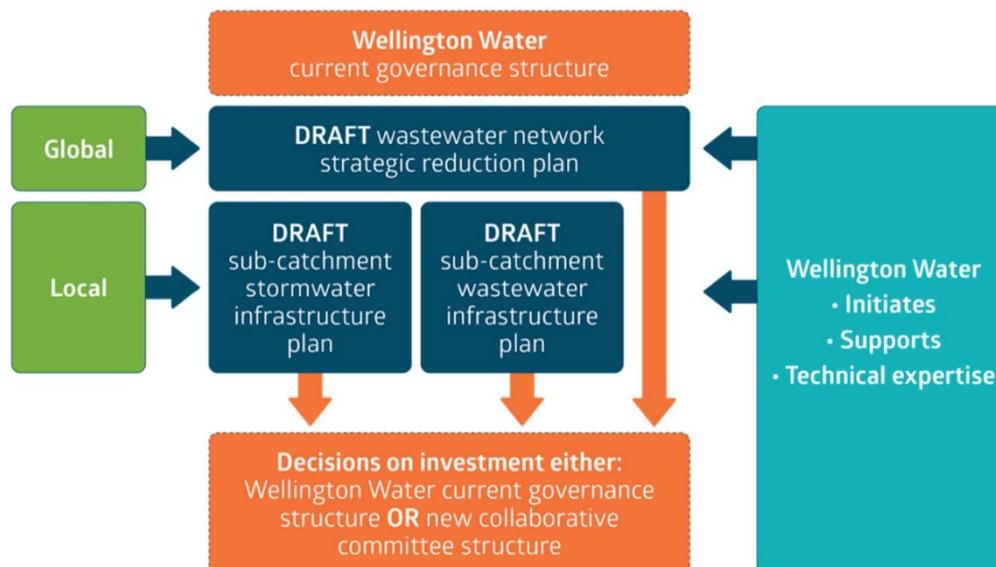


Community Engagement Framework: key points

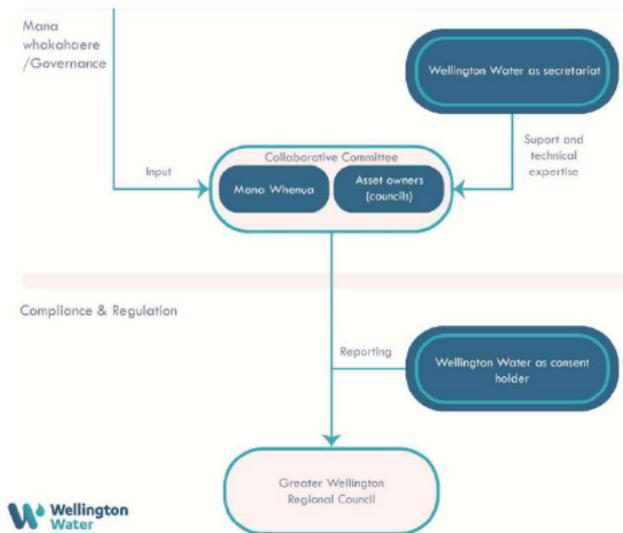
Global	Local (sub-catchment)
<ul style="list-style-type: none"> • Works across 4 cities and both stormwater and wastewater • Long-term, ongoing role • Input into strategic 4-city wide planning rather than advocating for local stream • Role in monitoring and reviewing progress • Can raise broader issues contributing to contamination 	<ul style="list-style-type: none"> • Works at sub-catchment level (e.g. stream or neighbourhood) • Fixed-term • Input into sub-catchment infrastructure planning for wastewater and stormwater • Role in identifying and advocating for local issues and advice on managing disruption

6.

Piloting the planning approach - indicative



Proposed reporting structure

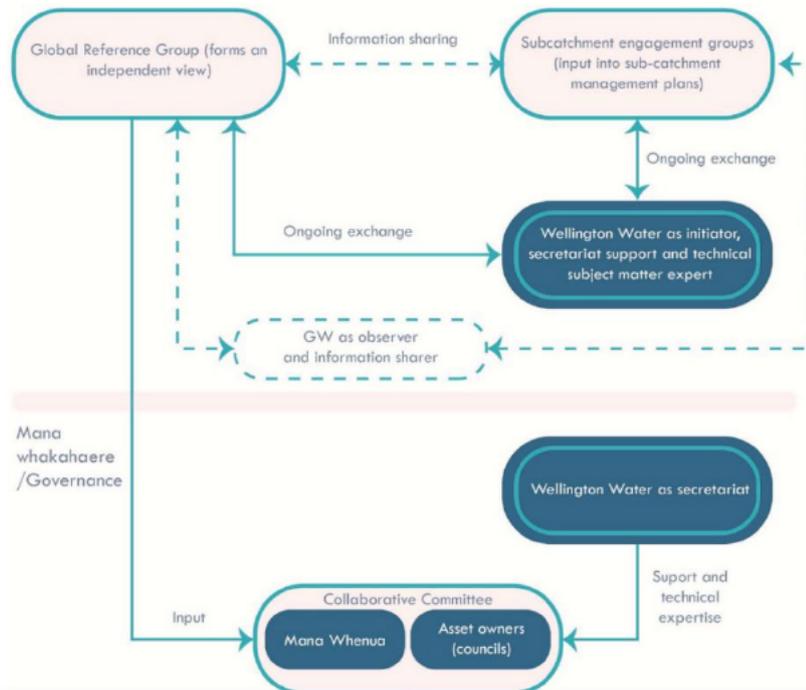


This diagram is also in the document available online



Our water, our future.

Proposed engagement structure



This diagram is also in the document available online



Our water, our future.

GWRC needs to be our leader

I would urge Greater Wellington as a regulator to adopt a leadership position in this space, to ensure that engagement with communities are meaningful and effective. This requires serious investment in:

1. Digital platforms and other mechanisms for data sharing that are responsive to community needs. Community needs to be meaningfully engaged in this. Involving community/catchment representatives in these processes and moving away from the old top-down model.
2. Increased funding for community/catchment monitoring programmes that meet local requirements/expectations.
3. Supporting our catchment communities and other groups who work for the environment by providing far greater financial assistance and administrative support at both the catchment and regional level. The recently formed Wellington Catchments Collective - Te Hononga Ki Te Upoko - would benefit from serious support.
4. Approval of major Resource Consents should be contingent on adequate funding for data sharing in forms appropriate to the community, and the establishment of community panels, supported by clear terms of reference.

Conclusion

In every area I have worked on, including water, predator trapping, penguins, civil defence, coastal communities and climate change, and residents associations, I find that these projects are in a sense all the same. They are attempts to make our suburbs, our towns, cities, our environment better by expanding popular participation in the process.

Let's work together, to weave the citizens and the water company, the catchment group and the councillors, the regulators and the community into a fabric that protects the community and the environment.

Kia tau te rite me te rangimarie - let peace and Justice shine.

Eugene Doyle

Appendix: Submissions I support in full

I would like to acknowledge and fully support two other submissions, those of Neil Deans and Lynn Cadenhead which appear below:

Neil Deans



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Submission on Greater Wellington Regional Council Plan Change 1

I am a resident and ratepayer of Wellington City and have worked in freshwater, conservation and recreational management throughout my career in many parts of the country. I am a former

President of the NZ Freshwater Science Society, and have provided advice to councils and Government, and in consenting, planning and national policy decisions throughout the country, predominantly on freshwater issues.

A stream adjoins our property which flows into the Waitohi (Ngauranga) catchment. I contribute to a community group seeking to improve the water and habitat quality of our local stream and am engaging with Te Hononga, a collective of such community catchment groups which has recently been established, centred on the metropolitan area.

I have been impressed by the Whaitua process undertaken by Greater Wellington Regional Council, and support moves to implement those recommendations made by Whaitua members to address freshwater issues in those catchment areas.

Thank you for the opportunity to make a submission to this process.

General comments

The state of water bodies reflects the use of land, water and other resources in their catchments.

Many of our water bodies have been neglected, piped, drained or land uses in their catchments intensified to the point that their community values have been severely compromised. Despite this, these streams and other water bodies continue to provide species' habitats and are worthy of collective action to improve them to ensure they remain community assets. Only with the support of collective action through the regional plan can we secure and improve our water bodies.

I therefore support the thrust of Plan Change 1 to require specific actions intended to improve our water bodies over time. I am concerned, however, that timeframes to have achieved improved outcomes are not just set several decades in the future, but also include interim and measurable milestones (such as by 2035) in achieving the ultimate goal by 2050 or 2100, for example. Only in this way can we be sure that the measures being taken are proving effective.

Rule 5.4.8 makes activities such as dams which have existed for 10 years or more permitted, provided conditions associated with the original permission have been adhered to. This does not address issues around fish passage, which in many cases was not required in earlier consenting. I seek that discretion be available to the Council to require fish passage be provided in such cases, where this would be practical and is required to enable access for fish around an artificial fish passage barrier.

I support the requirement for Freshwater Action Plans required in section 6.16.

Methods M43 and M45 to support the health of, and funding for, urban waterbodies, particularly in relation to stormwater discharges in combination with Wellington Water, is supported. This would also benefit from active endorsement by territorial local authorities in the development of existing and new urban development.

Similarly Method M44 to support health of rural water bodies is also supported.

Chapter 8 Whanganui-a-Tara

The objectives WH.01-WH.09 are supported, but as noted above, specific interim milestones are also required to be set to ensure the long-term objective will be achieved. This must be supported by numerical objectives and monitoring programmes to ensure actions are effective to meet the desired outcomes.

I support the numerical requirements for the lakes being accompanied by the equivalent for running waters; particularly the Hutt River catchment such as in Table 8.3. In all cases, human health for

contact recreation should be the standard where the water bodies are used for that purpose. The desired target attribute states in Table 8.4 are supported.

Policies WH.P1 to WH.P33 are all supported, including the associated target attribute states and flow requirements.

Rules WH.R1 to WH.R36 are all supported. Note that, wherever possible, water sensitive urban design should be required to minimise increased runoff intensity due to increasing hard surfaces.

Chapter 9 Te Awarua-0-Porirua

I support the provisions in this chapter.

I would welcome the opportunity to speak to this submission if it was available.

Many thanks

Neil Deans

Submission on Proposed Change 1 to the Natural Resources Plan for the Wellington Region, October 2023, from Lynn Cadenhead

Thank you for the opportunity to make a submission to this process.

I organise the Tyers Stream Restoration Group seeking to improve the water and habitat quality of a local stream in Khandallah and am engaging with Te Hononga, a collective of such community catchment groups which has recently been established.

The state of water bodies reflects the use of land, water and other resources in their catchments.

Many of our water bodies have been neglected, piped, drained or land uses in their catchments intensified to the point that their community values have been severely compromised. Despite this, these streams and other water bodies continue to provide species' habitats and are worthy of collective action to improve them to ensure they remain community assets. Only with the support of collective action through the regional plan can we secure and improve our water bodies.

I therefore support the thrust of Plan Change 1 to require specific actions intended to improve our water bodies over time. I would like the timeframes to achieve improved fresh water outcomes to include interim and measurable milestones (such as by 2035) and are not just set several decades in the future. Only in this way can we be sure that the measures being taken are proving effective.

I support the Whaitua process undertaken by Greater Wellington Regional Council, and support moves to implement those recommendations made by Whaitua members to address freshwater issues.

I support the direction in Plan Change 1. with regard to water. Greater Wellington has shown courage to bring this plan change to the public, and I urge councillors to continue to support these changes through to their implementation.

I support the objectives in Chapter 3 with the track changes shown below.

I support the Target Attribute States proposed in Chapter 3 and for Whaitua Te Whanganui-a-Tara with the proviso that if no other date is specified by 31 December 2026 the fall-back date should be 2035. in many cases these are only first step improvements to reverse the decline and get water quality above national bottom lines.

Any waterways that contain giant kokopu, shortjaw kokopu or lampreys should have the highest level of protection as these species are particularly vulnerable to an increase in sediment, temperature or other pollutants.

I believe there should be no new major developments on greenfield land; the existing urban areas in the Wellington Region are sufficient to provide for the increase in housing through densification.

I believe it is essential that all developments that increase the area of impermeable surface including infill housing, mandate at least neutral (or lesser) stormwater runoff compared with predevelopment. Retention of stormwater to manage stormwater volumes to avoid flashy rainfall runoff requires an initial depth of rainwater to be captured and not allowed to discharge as stormwater. I support all objectives, policies and rules that support this.

The costs of the work needed to achieve the outcomes in Proposed Change 1 will be significant but the costs of inaction outweigh those of action. The work will be more expensive in the future and ultimately those costs fall on future generations.

Alter as per the track changes below

3.7 Biodiversity, aquatic ecosystem health and mahinga kai

Objective O19

Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded such that:

(a) water quality, flows, water levels and aquatic and coastal habitats are managed to maintain and improve biodiversity, aquatic ecosystem health and mahinga kai, and

(b) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a freshwater body or coastal marine area is meaningfully improved so that the objective is met within a reasonable timeframe, and

(c) restoration of aquatic ecosystem health and mahinga kai is undertaken and required where land is developed that contains freshwater bodies. encouraged.

Note

For the purposes of this objective 'a reasonable timeframe' is a date for the applicable water body or coastal marine area inserted into this Plan through the plan change/s required by the RMA to implement the NPS-FM 2020, or 2050 2035 if no other date is specified by 31 December 2026.

Aquatic ecosystem health and mahinga kai objectives Table 3.4 Rivers and streams, page 16

	Mahinga kai species	
	N/A	
ities ient eir re tion rsity e of tate tic em n	<p>Mahinga kai species, including taonga species, are present in quantities, size and of a quality that is appropriate for the area and reflective of a healthy functioning ecosystem¹⁸</p> <p>Huanga of mahinga kai as identified by mana whenua are achieved.</p>	F r m ci j

Replace crossed out section of table 3.4 above with; **in a healthy ecological state.**

I support Objectives 025 and 028

I support Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.

I support Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.

Rule 5.4.8 makes activities such as dams which have existed for 10 years or more permitted, provided conditions associated with the original permission have been adhered to. This does not address issues around fish passage, which in many cases was not required in earlier consenting. I seek that discretion be available to the Council to require fish passage be provided in such cases, where this would be practical and is required to enable access for fish around an artificial fish passage barrier.

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