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| Submitter No. | S221 |
| Submitter Name | Generation Zero |
| Online submitter | Yes |
| Raw submission lodged | Yes |

Raw submission points

These are submission points that were lodged as part of an online submission. They have not been summarised.

| Raw sub point number | Provision | Support/oppose | Decision sought | Reasons |
|----------------------|--------------------------------|----------------|----------------------------|---------|
| S221.1 | Coastal water management units | Support | Please see pdf submission. | |

Raw submission documents

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| Generation Zero submission | gzfinalsubmission15.12.23.docx | | 15/12/2023 16:55 |

Submission to Greater Wellington Regional Council's Proposed Plan Change 1 to the Natural Resources Plan Consultation.

Generation Zero's submission

Introduction

Generation Zero would like to submit the following considerations regarding the proposed regional policy to the Greater Wellington Regional Council's Proposed Plan Change 1 to the Natural Resources Plan Consultation.

Generation Zero is an organisation of young people around Aotearoa who advocate for climate justice through community led actions. We were established in 2011 to create localised climate action and ensure that rangatahi have a voice in the climate movement. We felt that climate action was being side-lined in public and political spaces in Aotearoa, and that the people most affected by climate change, including rangatahi, were not being heard.

We hold a vision for the Wellington region with spaces where all people are able to live well: where tangata whenua are included and equitably represented in democratic processes of water management; communities are resilient to the future effects of climate change; and green and blue spaces are free, accessible, and in abundance.

Support for mana whenua

Earlier this year we had the privilege of visiting Ngāti toa kura (school) as a part of our art competition to get young people across the Wellington region imagining what a climate safe future would look like to them. The tamariki spoke to us about how a climate safe future for them is intrinsic with a healthy harbour and river. They wanted to be able to collect kai moana like their tipuna did, and they wanted to be able to swim in the harbour safely. The Mana whenua of the Porirua catchment, Ngāti Toa have a rich cultural heritage that is deeply intertwined with the moana. The current quality of water disproportionately affects their physical health and also jeopardizes the cultural practices and mātauranga that reinforce them. This also impacts mana whenua across the Wellington region.

As Generation Zero we want to tautoko the dreams of these tamariki as the standard to reach, as if they are able to collect kai moana from the harbour this will indicate that the health of the waterways earlier in the catchment is at a good standard.

Submission points

We support the recommendations for improving the health and wellbeing of coastal waterbodies towards Te Mana o te Wai in Waituata Te Whanganui-a-tara.

Te Mana o Te Wai is the central focus of the NPS-FM 2020 and must be 'given effect' to as opposed to 'considered and recognised'. This creates a strong requirement to give effect to community and mana whenua values. It's notable that the obligations identified by Kāhui Wai Māori were ranked in a hierarchy; with the health and wellbeing of water bodies and freshwater

ecosystems taking precedence over the needs of people and their social, economic, and cultural wellbeing.

We suggest this be implemented in sections such as 4.6 on Biodiversity, where “maintain or where practicable restore” could focus on improvement as well as restoration. The current wording presents restoration as optional, as suggested by the use of ‘or’, and ‘where practicable’ creates an easy opt out of restoration. We suggest that the goal of policy should not simply be maintenance but improvement of freshwater health for future generations. This would be more in line with the principles of stewardship and Kaitiakitanga inherent to Te Mana o te Wai.

We support the emphasis on coastal receiving environments despite this not being a requirement of the NPS-2020 and believe this to be a good choice of direction. This aligns with the set objectives of a holistic water health approach and also aligns with te ara Wairua o te Wai (the pathway and spirit of the water) values identified through community engagement.

We recognise that there is a need for regulations to be practical and practicable. However we encourage ambition in pursuing TAS and coastal water objectives. Therefore we endorse the TAS objective of Option 1 (achieving goals by 2040) as opposed to 2050/2060, because the shorter timeframe would incentivise greater innovation. It would also be pragmatic to have interim targets as well, as more options could make the timeframe less divisive.

It is worth highlighting that the cost of wastewater improvements has been assessed in predicted cost to rate-payers but does not quantify a cost benefit analysis due to social and cultural benefits being unquantifiable. It is true that many of the benefits of improving wastewater systems are not quantifiable. However we would like to point out that the monetary cost of not improving such systems over the next 40 years has not been assessed. Wastewater infrastructure needs to be resilient to factor changes such as projected population growth, increased extreme rainfall, and sea level rise. The impact of these changes is difficult to quantify but it is worth keeping in mind to balance against improvement costs. Investment in infrastructure that is resilient long term will provide risk reduction value as well as the identified social and cultural benefits.

As a climate focused organisation we are concerned about the degradation of water quality resulting from untreated stormwater discharges. We emphasise that coastal areas, harbours, and freshwater rivers are taonga and the release of untreated wastewater into them is detrimental to the health and wellbeing of the surrounding environment and community.

The number of Part FMUs where the copper and zinc baselines are D and C is extremely concerning. We support the recommendations of the Te Awarua-o-Porirua WIP in regard to this topic, and also support that Policy Package Option 1 is the preferred choice of action.

In terms of new urban development, we support the preference for infill housing and brownfield redevelopment. Upzoning is the most environmentally friendly strategy for meeting housing shortage needs, but on a pragmatic level it also is beneficial cost-wise to improve storm water in

existing urban areas as opposed to creating new stormwater systems in greenfield areas. Redevelopment of existing urban systems is also necessary to accommodate for projected urban intensification and ensure increased stormwater volumes do not further degrade surrounding waterways. We endorse Policy Package Options 1 and 3, but not 2 as it poses the highest risk of degradation.

Engagement with community and young people

We would also propose a more collaborative approach with members of the community who would be affected by regulations to promote a greater sense of social cohesion and minimise backlash to economic costs of improving infrastructure. This could be improved by creating more simplified guides to RPS changes so submissions are more accessible to the community, especially younger generations. This would promote collective engagement on the shared goal of environmental stewardship.

Thank you for taking the time to read our submission, and we are open to speak further upon it.

Ngā mihi nui,

Generation Zero