

SUBMISSION ON PLAN CHANGE 1

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I will not gain an advantage in trade from this submission

I am submitting as an individual

I wish to speak to my submission

SUBMISSION

1. I strongly support the water and indigenous biodiversity elements of PC1: they're an important first step.
2. Without good rules, nothing else in our systems can work.

Water aspects:

3. I strongly support the objectives for all the catchments in Te Upoko o te Ika, suggesting that where the phrase "on a trajectory of measurable improvement" is used, the definition of "measurable" includes something to the effect of *statistically significant or other appropriate magnitude measure*. This might not be a useful addition - I'm not a planner! but I'd like to see these made even harder-edged, and more difficult to fudge.
4. I also strongly support the Target Attribute States proposed for all catchments except for Te Awarua o Porirua which I would like to see strengthened as this is my forever home.

Suggestions for the content of table 9.2:

5. I'm not a scientist but there seem to be too many "maintain" TASs versus Improve - for example, dissolved oxygen, nitrogen, phosphorus - which, if strengthened to an "improve", might be able to drive more strongly a higher-performing urban form in any greenfields development (which we shouldn't be doing anyway unless it's extremely high-performing (e.g. Berlin quality in water sensitivity), for [these reasons](#) and because it's simply unaffordable to maintain low-density development).

COMMENTS NOT SPECIFIC TO ANY CATCHMENT (APPLY TO ALL):

6. Te Mana o te Wai is a vital overarching and underpinning concept for how we think about and deal with water. It's also really new to local authorities, so suggestions are:

7. the hierarchy of obligations in Te Mana o te Wai is made clearer in the definitions and objectives, including prioritising mana whenua and their whakapapa and tikanga in decision-making for water
8. PC1 make clearer that Te Mana o te Wai guides all policy, plans and consents that impact on three waters, from the earliest stage of consideration and before options are presented to regional council, Planning Committee or consulted on with communities.
9. On funding: Method M45 is a good thing. Funding gaps should be avoided.
10. Standards should also be developed for minimum performance of stormwater retention devices and other green infrastructure as these are typically done quite badly - again, because this is new to NZ.
11. Standards should also be developed, and elements required for building consents, to reduce (and ideally prevent) copper and zinc getting into stormwater. MBIE should be promoting this kind of source control.
12. Disposing of sewage sludge on land, and systems to hold / treat wastewater on site, are really important and don't get enough coverage here.
13. As a minimum, let's have reference to (and draw on) the forthcoming Guidelines for Beneficial Use of Organic Materials on Productive Land (due next year)
14. Let's avoid any duplication between the statutory requirements and processes of the Water Services Entities Act 2022 and the plans and policies required under it and what's required by the Resource Management Act, Spatial Planning Act, Natural Built Environments Act - including regional councils' freshwater plans.
 - 14.1. There's a similar potential for duplication between the requirement for asset management plans (AMPs), and "a proactive programme of maintenance and renewals of the public wastewater network infrastructure to improve pipe condition, inflow and infiltration management, and reduces pipe failures as a result of blockages within the network or due to aging infrastructure". If AMPs are not doing this job, they should be rewritten so they're strategically tied to manifesting the objectives of the relevant FMU or pFMU.
15. I support the rules in Schedule P (Efficient use) but we also need an enabling framework for allocating freshwater in the PPC1 that manifests the hierarchy of obligations of Te Mana o Te Wai, and motivates people and organisations within a catchment to use water much more efficiently. It also needs to account for leaks and a precautionary approach given climate change.
16. Ongoing performance
17. The construction, performance monitoring and inspection and pinging (enforcement) of things like on-site wastewater treatment facilities are absolutely crucial, given the importance of these things for reducing peak loads on vulnerable infrastructure (especially enabling intensification), and also their potential to pollute the wider network if badly built and not properly maintained.
 - 17.1. I suggest there be minimum standards for construction, and template/standardised consent conditions for their operation and monitoring their

performance - so we can make sure these things are actually working as they should years after they've been built.

REASONS AND COMMENTARY:

18. The whitua process has been remarkable and the sound rules that come out of it, with their unique combination of inputs, is an essential part of us having a region that's not destroying the natural systems we rely upon.
19. The effects that stronger rules have on urban development and infrastructure are excellent. We must use the rules to drive improvement throughout all the ways we use land and water, not weaken the rules because we're used to being rubbish. ,existing rules and controls intended to prevent people building on flood plains, and to protect overland flow paths, get overridden or they're simply too loose to meaningfully steer developments.
20. The costs imposed on those who shape our landuse and our land are important. If our local developers can't do the development in the way they want because the resulting trashing of wai is now not allowed, that's great: it will encourage them to innovate and improve processes, or exit this market. For far too long it's been a race to the bottom in the Wellington region, with councils undercutting each other's environmental protections to try and lure development to feed our Ponzi scheme of growth. Our councils and developers have been letting the region down (especially compared to other regions like Auckland and the Waikato).
21. Density done well is one of the greatest gifts to an urban area because its higher levels of taxable activity per hectare which enable more all sorts of good things including more sophisticated water management. I refer council to the piles of scientific and economic evidence on this point from cities overseas, and ongoing work by
22. So we must all lean into the challenge and not try to dodge these costs or push them back onto the environment.
23. Let's start problem-solving together how best we can resource being better at landuse for our water's sake. We are more than capable, and the rejigging of the machinery-of-government for infrastructure - plus the social licence of a generalised water crisis in NZ - gives us a great opportunity for a much better system to be built with the new PC1 rules as its foundation.
24. [ENDS]