

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

<p>*Submitter Name: Full name, or Name of Organisation / Company</p>	Friends of Waipāhihi Karori Stream (F.O.W.K.S.)
<p>Contact person for submission: (If different to above)</p>	Joanne Davidson
<p>Telephone no: (Not required)</p>	
<p>*Address for service: (Email, or physical address) Please note, an <u>email address</u> is the preferred method</p>	Joanne.davidson02@gmail.com
<p>*I wish to be heard in support of my submission at a hearing</p>	Select yes or no
<p>*I would consider presenting a joint case at the hearing with others who make a similar submission</p>	Yes
<p>*I could gain an advantage in trade competition through this submission</p>	No
<p>In providing a submission to Greater Wellington, I agree to having read and understood the terms and procees outlined in this Information Statement</p>	
<p>If providing a submission on behalf of a company / organisation I confirm that I have authority to do so:</p>	Joanne Davidson

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

F.O.W.K.S. (Friends of Waipāhihi Karori Stream) are an active stream care group working to improve the water and habitat quality of Waipāhihi Karori Stream from the mountains to the sea. We are particularly active in the upper catchment, where Karori suburb is located. We have three sites that we monitor on a quarterly basis and a fourth site that is a focus for restoration.

We have 10 core members and a wider group of approximately 140 people who follow and periodically support our activities. We are supported by the Karori Residents Association and have a MOU with Wellington City Council for our work under the Resident's Association umbrella. We are also actively connected with Te Hononga, a collective of similar community catchment groups within our rohe which has recently been established. We are fortunate to be supported by Mountains to Sea Wellington and we are also grateful for the support of Ghost Diving New Zealand who help us run major stream clean ups at Karori Park.

We support the direction in Plan Change 1. Greater Wellington has shown courage to bring this plan change to the public, and we urge councillors to continue to support these changes through to their implementation. Local community groups like ours are doing what we can, but we need Plan Change 1 to solve some of the biggest problems. Addressing matters like aging and leaky infrastructure, inappropriate urban development and poor land use practices takes a strong (and enforced) regulatory backbone.

Waipāhihi Karori Stream is particularly impacted by extremely poor water quality in relation to E. coli, as shown both by Greater Wellington State of the Environment monitoring and our own monthly citizen science monitoring. To quote Bill Guest, a member of F.O.W.K.S. and a long-time advocate for our stream who sadly passed before he could see improvements, "councils need to focus on the basics, like "fixing the b****y pipes".

We realise that one of the more contentious issues is likely to be the timeframe for improvement, particularly in relation to E. coli. Our urban streams are generally well below national bottom lines and are not places you'd want to let your children paddle or build dams. This also impacts on our beaches and harbour, including the jumping platform outside of Te Papa. While we support the overall thrust of the proposed plan changes, we particularly support:

- The proposed timeframes for achieving the target attribute states. The proposed plan change sets a target of 2040 for first step improvements which for many water quality factors and places will simply be enough to reverse the decline and get above national bottom lines. In relation to E. coli, for Karori Waipāhihi Stream that's moving from an "E grade and very likely degrading" to "C grade".
- The measures to reduce wet weather overflows and dry weather discharges from the wastewater system. We would like these to be removed completely, but appreciate that there is some complexity. In a changing climate, our stormwater and wastewater infrastructure needs to be redesigned to withstand levels of rainfall far beyond what we have experienced in the past.

Karori is also a suburb living with flood risk and that is a focus for infill housing. We 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. We support all objectives, policies and rules that support this.

We understand that Wellington City Council will submit that the timeframes for achieving the target attribute state be extended to 2060, and that this is on the basis of a slim majority vote amongst councillors. Those voting for 2060 included our local representatives for Karori and we want it noted that those representatives did not consult with us nor the wider Karori community before taking that stance. They do not speak for us on this matter.

Waipāhihi Karori Stream and its community are likely to be most impacted by the timeline. We are realistic that our suburb and our beloved stream is likely to be, from a regional perspective, of lower priority than others. Our suburb is not over a drinking water source. Waipāhihi Karori Stream does not end at a swimming beach. Waipāhihi Karori Stream does not have the same level of significance to mana whenua as catchments like Kaiwharawhara (which has its origins at the city-end of Karori).

Our community has been asking for these problems to be solved for decades. We do not want to wait any longer. People in our community value our stream, they want to be able to safely play and learn in it. We want the health warning signs that our Karori Residents Association had to fight for¹ to be able to be removed. We love our tuna and are proud that our stream has been recognised as important habitat for them², but our community wants to enjoy more abundant biodiversity than just those species agile enough to make their way past fish barriers.

We oppose the timeframes for achieving the target attribute states being extended beyond what is proposed. The timeframes would already be strengthened by the addition of interim and measurable milestones (such as by 2030 and 2035). This will be essential if the timeframe is extended, or it will be an excuse to delay action and we will find ourselves close to the deadline with not enough having been done and people once again making excuses to extend timelines.

You will hear from many submitters that the measures in the proposed plan change are too expensive, will constrain development, or can't be achieved. We urge you to stay the course and support these changes through to implementation. Yes, it will be expensive, but this is not a reason to water down these regulations. 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.

Our councils need to prioritise better to focus on the basics. Wellington City Council in particular has let us down in the past by collecting money from ratepayers to cover depreciation of water assets and redirecting that funding towards other priorities.³ In addition, we believe that new sources of funding can be found with the right leadership. And we note with interest that the new Government has indicated that they are open to exploring options such as sharing the GST take with councils.

We also particularly support the Freshwater Action Plan programme in 6.16. We expect that groups such as ours will be active partners in the design, monitoring and implementation of those plans and not just "consulted with". One of our challenges as a group is getting access to good information, finding the right people to help us with our restoration goals, and understanding where we are best to focus our own precious time and effort as volunteers in the context of wider efforts. We would also like to see more consistent and equitable resourcing for catchment groups like ours, for example all catchments having a funded community-based co-ordinator.

¹ A long fight because officials mistakenly didn't think people used the stream or had a right to expect to be able to.

² Ministry for the Environment. Water Programme of Action: Potential water bodies of national importance. July 2004.

³ Wellington City Council. The Mayoral Taskforce on the Three Waters Report. 2020.

To sum up, we support the Whaitua process undertaken by Greater Wellington Regional Council and support moves to implement those recommendations made by Whaitua committee members and mana whenua to address freshwater issues.

Whāia te iti kahurangi ki te tūohu koe me he maunga teitei: Seek the treasure you value most dearly; if you bow your head, let it be to a lofty mountain.