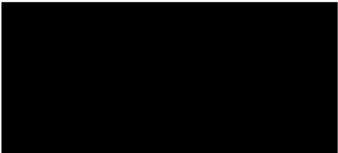


Submission on Proposed Change 1 to the Natural Resources Plan for the Wellington Region, October 2023

<p>*Submitter Name: Full name, or Name of Organisation / Company</p>	Anya Pollock
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<p>*I wish to be heard in support of my submission at a hearing</p>	Yes
<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>	

I am a resident and ratepayer of Wellington City. I was raised in Stokes Valley in the catchment for Te Awakairangi. I now live in Karori, where Waipāhihi Karori Stream flows through my property. I am a member of F.O.W.K.S. (Friends of Waipāhihi Karori Stream) and was a community member on Whaitua Te Whanganui-a-Tara Committee. I continue to serve on the Whaitua Te Whanganui-a-Tara Reference Group. I also contribute to Te Hononga, a collective of community catchment groups which has recently been established. I have worked in national freshwater policy, including close involvement with the Land and Water Forum and the National Policy Statement for Freshwater Management.

I appreciate the alterations made to Plan Change 1 following the limited notification consultation on a previous draft, particularly those that have brought it closer to implementing the intent of recommendations made in Te Whaitua Te Whanganui-a-Tara Implementation Plan and Te Mahere Wai. Thank you for the further opportunity to make a submission to this process. I also support in full the submission of F.O.W.K.S. (Friends of Waipāhihi Karori Stream) and this personal submission largely supplements the points made in that.

Many of our water bodies have been neglected, piped, drained or land uses in their catchments intensified to the point that their environmental 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. In addition, even our urban streams are important to our communities as places where we can paddle and play or collect kai. There are parts of Waipāhihi Karori Stream that form small swimming holes that some of our community use despite the risks to human health.

In the context of environmental education, the impact of programmes is increased where students already have high levels of connection to nature.¹ This suggests that a close and frequent relationship with the natural environment may be more impactful on environmentally conscious behaviours, including those needed to reduce emissions, than short-term one-off programmes. Children being safe to play and learn in their local stream as part of the school curriculum and daily life is a powerful enabler of kaitiakitanga, but is currently limited by the state of our waterways.

Only with the support of collective action through the regional plan can we secure and improve our water bodies. Our communities and our waterways have been let down by decades of weak planning provisions and successive councils that have not made use of the tools available to them to limit harm to our environment. Greater Wellington has shown commitment and courage in the way it has approached implementation of stronger national direction, in particular the Whaitua process and efforts to give power back to mana whenua as the Kaitiaki of this place.

The recommendations in Te Whaitua Te Whanganui-a-Tara Implementation Plan are designed to open up potential for a future that feels out of reach right now. It requires a strengths-based continuous improvement approach, with each of us striving to reduce impacts to the best of our

¹ Julie Whitburn, Wokje Abrahamse, Wayne Linklater, Do environmental education fieldtrips strengthen children's connection to nature and promote environmental behaviour or wellbeing?, *Current Research in Ecological and Social Psychology*, Volume 5, 2023, 100163, ISSN 2666-6227, <https://doi.org/10.1016/j.cresp.2023.100163>. (<https://www.sciencedirect.com/science/article/pii/S266662272300076X>)

ability in the context and time we are in. As we achieve more and learn more, we will be able to do more to reduce our impacts and improve our relationship with water, ultimately achieving waiora.

I support the direction in Plan Change 1. I appreciate that the regulatory framework that the Council is operating in is not designed to support this sort of mindset. I commend the officials who have worked to stretch the bounds of flexibility that exist and create planning provisions that reflect this mindset as best they can. I urge councillors to continue to support these changes through to their implementation, including funding sufficient support and enforcement activities.

While 'enforcement' is what the regulatory function is called, and for some people a rule and a stick is what it takes, the intent of the Whaitua recommendations is more about the regulator having an ongoing reciprocal relationship with those they are regulating. A relationship which challenges and supports people to minimise their impacts based on the assumption that most people don't set out to cause harm to the environment. We want a regulatory approach that creates a mindset and values shift that will ultimately open up the potential for a further step change next time target attribute states are reviewed.

There is a hierarchy and deliberate location of powers and functions in New Zealand's planning system. District plans and decision making needs to be driven by, and consistent with, the regional plan. Regional decisions on the regional plan, including the timeframes set to reach target attribute states, should not be constrained by past decisions made by territorial authorities. Once finalised, territorial authorities need to revisit their plans, strategies and investments to comply with the environmental standards and improvement pathways set in the regional plan alongside the other outcomes they are responsible for.

The timelines in the proposed Plan Change, which reflect those recommended by the Whaitua Committee are ambitious and challenging. This is deliberate. The Whaitua committee debated the appropriate target date to set balancing mana whenua and community aspirations for healthier waterways with the unique challenges of addressing infrastructure issues in an urban environment. We believe that if we focus on creating potential and aim high, the solutions will come. *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.*

There will be more Plan Changes to come. If after trying for some time that it really is beyond our reach, or something unexpected disrupts progress, then by agreement with mana whenua and the community the trajectory can be adjusted in the future. If we find that by aiming high, we are unlocking solutions and potentiality for progress beyond what we had hoped, then we can adjust the trajectory to move faster towards waiora than we currently are.

We may also find that there are some things where historic decisions have created legacy issues, such as aged faecal contamination, that mean we will struggle to achieve what we aspire to. This doesn't change the need for us to do everything we can to stay on a trajectory of infrastructure improvement that will eventually bring the negative impacts of current and future activities down to zero. In that spirit, legacy infrastructure should not be excluded from needing to reflect on what opportunities there might be to reduce its impacts.

For example, 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.

The proposed Plan Change also consolidates planning provisions that are about the environment into one place. It is right that the rules that exist to protect the environment are set by the agency whose primary purpose it is to care for the environment. It is also right that there is a consistent approach across the region, both for the environment and to provide greater consistency, certainty for developers and to ensure that the environment doesn't get traded off as different districts compete for developer investment.

The need for territorial authorities to update their plans or processes should not be a reason to undermine the integrity of the regional planning framework. Similarly, ease and efficiency of consenting is best achieved by the multiple agencies working together to design and deliver integrated services across all of the planning and consenting requirements, not by shifting regional functions into district plans.

I believe the inducement to do less on greenfield land and more on brownfield is good, is necessary to meet the objectives, and also helps us do better cities. We can solve our housing shortfall and still do better for the environment, but only if we deliberately build it in everytime. It is important that water sensitive urban design becomes the norm across our region, and that we factor in and fund ongoing maintenance of infrastructure.

I believe the costs are important and our task is not to try and dodge them, push them back onto the environment, or kick the can down the road even further, but to problem-solve together how best we can resource doing water better. The costs to today's and tomorrow's ratepayers are higher because we have not funded this properly in the past and, in some cases, have used funding that should have gone into infrastructure maintenance to pay for unrelated activities. We cannot change the past, but we can commit to stop making the same mistakes and leave future generations a positive environmental legacy instead of a litany of unsolved problems. New sources of funding can be found with the right leadership and a curious approach that asks "how might we?" instead of just saying "we can't". *I orea te tuatara ka patu ki waho: A problem is solved by continuing to find solutions.*