

Before The Freshwater Hearing Panel

Under the s 80A and Part 4 of Schedule 1 to the
Resource Management Act 1991

In the matter of Proposed Change 1 to the Regional Policy
Statement for the Wellington Region

HEARING STREAM 3

LEGAL SUBMISSIONS FOR WELLINGTON WATER LTD

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(Counsel)

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Introduction

1. These submissions are made on behalf of Wellington Water Limited.
2. Wellington Water is both a submitter (S113) and further submitter (FS19) on Plan Change 1 to the Regional Policy Statement for the Wellington Region (**PC1**). Its submissions collectively raise matters relevant to three s 42A topics for Hearing Stream 3:
 - 2.1 Climate Change (General)
 - 2.2 Climate Resilience and Nature-Based Solutions
 - 2.3 Energy, Waste and Industry General climate change related matters,
3. Planning evidence to support Wellington Water's position will be given by Caroline Horrox.

Water Security

4. As the provider of water supply services for 6 councils in the region, Wellington Water has an obvious interest in water security.
5. In particular, it has an important role in providing water for the health needs of people. This extends beyond safe drinking water and basic sanitation to all other health needs, whether those arise in homes, workplaces, schools, hospitals or elsewhere. This accounts for the great majority of water use in the region, with only a small fraction of water supply (less than 15%) being used for industrial purposes.
6. Wellington Water is therefore focussed on the ways in which climate change may impact on water security; namely the increasing potential and severity of drought, and the increased risk of saline intrusion into aquifers associated with sea level rise.
7. Ms Horrox agrees with Mr Wyeth's approach regarding water security in the introductory issues of Chapter 3.1A, and so Wellington Water will return to address water security more fully through relevant regulatory provisions in later hearing streams.

Natural Hazards

8. Wellington Water has sought that the definition of 'minimise' is amended for consistency with the existing definition of the Natural Resources Plan (NRP), which is supported by Ms Horrox and Mr Beban. This position reflects the work that was undertaken by Wellington Water and other infrastructure providers to engage with this issue during the development and refinement of the NRP.
9. Infrastructure providers have a huge amount of work ahead of them to respond to climate change issues and to implement Te Mana o te Wai. The definition of 'minimise' must adequately capture the scale and difficulty of these challenges, which is why Wellington Water supports consistency with the approach mapped out in the NRP.
10. Further, Wellington Water has an important role to play in managing natural hazards, including managing the increased risk of natural hazards, because Wellington Water has to manage the stormwater network. Managing the stormwater network by necessity requires Wellington Water to often undertake work in high hazard areas. Some examples are addressed in Ms Horrox's evidence at paragraph 16.
11. In addition to this, Wellington Water must ensure water services are resilient to natural hazards, so that communities can continue to be serviced following hazard events.

Nature-based solutions

12. Wellington Water supports the promotion of nature-based solutions, but also recognises that some aspects of the ongoing provision of water services are simply not amenable to nature-based solutions. For example, improving freshwater quality (and implementing Te Mana o te Wai) will require additional storage tanks for wastewater overflows. There is no feasible nature-based alternative solution at this point in time. Likewise within the next 30 years, an additional water storage lake is likely to require Wellington Water to use impermeable manufactured substances to construct the base of such a new lake. Again, there is no nature-based alternative to this.

Supporting the Delivery of Te Mana o te Wai

13. Wellington Water has a key role in the implementation of Te Mana o te Wai for Wellington. This arises across all aspects of water services. In water

supply, Wellington Water must improve the management of the freshwater that is taken from rivers and from the aquifer. In wastewater, it must work on improved and more reliable wastewater plant performance, reduction of wet weather overflows from the wastewater network, and improved management of the blockages that can create overflows. In stormwater management, it must work with communities to ensure there is less contamination reaching waterways.

14. Collectively, these works to deliver Te Mana o te Wai will require billions of dollars of investment over 30 years, and are a complete re-orientation of how Wellington Water delivers water services. A core element of this is working in greater partnership with mana whenua, and to that end Wellington Water is developing Partnership Agreements that will provide an organisational framework for supporting mana whakahaere, kaitiakitanga and manaakitanga.



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