

HAMILTON CITY COUNCIL – STAFF FEEDBACK

Draft Water Security Strategy for the Waikato Region (January 2023)

Waikato Regional Council



10 March 2023



**Hamilton
City Council**
Te kaunihera o Kirikiriroa

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this feedback is aligned to the priority **'A city where our people thrive'**.

Council Approval and Reference

This staff feedback was approved by Hamilton City Council's Chief Executive on 10 March 2023.

Hamilton City Council Reference D-4606677 - Feedback # 727.

It should be noted that the following feedback is from staff at Hamilton City Council and does not therefore necessarily represent the views of the Council itself.

Key Messages and Recommendations

1. Overall, Hamilton City Council staff support the aim and recommendations outlined in the **Draft Water Security Strategy for the Waikato (January 2023)**.
2. We consider that an agreed definition of Water Security will be critical to a Strategy and should be explored with other agencies to assist in setting appropriate scope and objectives and understand all facets of water security.
3. Given the Three Waters reforms, LGA, and RMA reforms, the interaction of the Strategy with Water Services Entities needs to be given further consideration. This would also include revisiting the nature of boundaries, transboundary collaboration, future consenting, and regulations.
4. We recommend expanding the legislative drivers to include Iwi Management Plans, the National Policy Statement for Freshwater Management 2020, and the National Policy Statement on Urban Development 2020. The current legislative framework can be used to encourage policy implementation and fill gaps in practice. The need for the Strategy and its impact, therefore, needs to have a strong rationale.
5. We recommend the Strategy to develop the vision, objectives, and goals in alignment with the functions of territorial authorities to ensure an ongoing optimum water supply and adequate allocation of water.
6. The draft Strategy is heavy on technical and scientific foundations which diverts the reader's attention away from the strategic direction and vision. We have provided recommendations to focus on the strategic direction and commitment to action.
7. We recommend using the research work done in Australia and noting the lessons learnt from areas currently dealing with high risks to water security. It would be good to draw insights from water security-stricken places such as Australia, or highly populated cities with constrained access to natural water resources.
8. We recommend the Strategy to highlight the need for innovative and alternative water sources to provide for options when the awa reaches its maximum allocation capacity. Hamilton City Council has previously commissioned assessments to better understand the options available for alternative water sources.
9. We recommend infrastructure planning and resilience be recognised as an important contributor to water security.
10. We recommend interagency collaboration to develop and finalise the objectives and vision for the Strategy. This would ensure adequate collaboration and multilateral action is carried through in the implementation phase.
11. We recommend that the region's Future Proof Strategy is recognised as a key Strategy for alignment and that collaboration with the partners that developed the Future Proof Strategy is necessary.
12. The Strategy should outline how water security will be measured and monitored.

Introduction

13. Hamilton City Council staff appreciate the opportunity to provide feedback on the Waikato Regional Council's **Draft Water Security Strategy for the Waikato (January 2023)**.
14. Defining water security is key for scoping the Strategy, what needs to be considered in the region, and developing action plans. There is no argument about the definition that has been placed in the draft Strategy, but it will need further teasing out in the context of the region and agreement on its application.
15. Significant reforms are underway (RMA, freshwater, water services and LGA). It will be important for the Strategy to recognise changes in regulation, and their relevance to water security, and to pick up on key legislative drivers and plans that assist in water management. This includes, but is not limited to, National Policy Statements and iwi management plans.
16. Recent climate change events highlight the importance of infrastructure resilience to water security and includes both regional infrastructure (e.g., stop banks and highways), and local infrastructure (e.g., three waters networks). The New Zealand Infrastructure Strategy provides some direction in this regard. In the development of this Water Security Strategy, it will be important to collaborate with those agencies responsible for infrastructure. Climate change warming and impacts on source water quality is also a key consideration.
17. With some relevance to the above point, the reliance on single water sources to provide sanitation and firefighting needs for communities makes those communities vulnerable. The Strategy will need to consider the issue of needing alternative water sources and consider how any regulatory barriers to minimising community vulnerability can be removed.
18. The Future Proof Strategy is a 30-year growth management and implementation plan specific to the Hamilton, Waipā and Waikato subregion within the context of the broader Hamilton-Auckland Corridor and Hamilton-Waikato Metropolitan areas, which include important adjacent areas such as Pukekohe, Drury and Morrinsville. It is a key Strategy that is very relevant to a Water Security Strategy.
19. The value of Future Proof enables joined up thinking and a vehicle for: giving effect to Te Ture Whaimana o Te Awa o Waikato; providing certainty about the future growth and development; providing thought leadership on key strategic issues relevant to growth management; affirming partnerships with and between taangata whenua, the Crown and Local Government; advocating collectively on agreed matters; achieving an integrated settlement pattern that is coordinated, enabling, and aligns with infrastructure and funding; maintaining a common evidence base; collaborating on growth management and cross boundary issues; working together to protect and enhance the natural environment; setting sub-regional policy and approaches relevant to the Future Proof Strategy; and using the foregoing to inform key regional documents such as the Waikato Regional Policy Statement, the Waikato Regional Land Transport Plan, and the Waikato Plan to promote sustainable resource use.
20. The most recent revision has a stronger transformational move for water management and water sensitive cities. We recommend that the Water Security Strategy recognises Future Proof and collaborate with the committee who developed and implement it (including the Waikato Regional Council who is a partner).
21. We recommend the following to provide more focus on the strategic direction and commitment to action.

- Move the technical sections into an addendum to use first half of the Strategy to highlight the strategic fit, high level context, direction, and vision.
 - Use a diagram to show how the Strategy fits in the hierarchy of other documents such as regional plans and policy statements.
 - Demonstrate how the Strategy will incorporate the tools that are already available in other regional documents.
 - Include actionable items such as development and monitoring of action plans to implement the Strategy and provide new outcomes that don't exist already.
- 22.** We recommend adding a purpose statement and a clear vision for what needs to be achieved (e.g., livelihoods, wellbeing, socio-economic, while upholding Te Mana o te Wai with direction setting by Te Ture Whaimana, and the management of pollution, disasters, and ecosystem resilience). The Strategy should also clarify who would be involved in implementing the Strategy.
- 23.** The section could focus on the unique attributes of the Waikato Region, including the river, the people, types of industry, growth, and water allocation issues. For example, the use of the United Nation's definition of water security could restrict the scope of what security means for the Waikato Region and community.
- 24.** We recommend the Strategy to state how it will address the fundamental issues under Te Ture Whaimana. There is a disconnect between this section and the strategic objectives, which could be resolved by drafting the Strategy using a TMoTW lens throughout the process of writing and analysis.
- 25.** We recommend switching the order of Te Ture Whaimana and Te Mana o te Wai. Given the importance of Te Ture Whaimana, the Strategy could use its vision if this is to be the direction settling document.

Scope

- 26.** The draft Strategy focuses on water availability. We recommend the Strategy to:
- Widen the scope to cover all aspects of water security.
 - Provide clarity on where the health and wellbeing of the awa sits within the scope of the Strategy.
- 27.** We suggest the Strategy to take a phased/ 'road map approach' to focus on water quantity as an initial priority for Phase 1 (1-5 years). Objectives to ensure water quality, reduced risks to water source and access to water could be brought in Phase 2 (5-10 years).
- 28.** Additionally, it would be useful to have two headers, 'in scope' and 'out of scope' with bullet points underneath to clearly set out the scope of the Strategy and associated implications for the reader.

Our Water Security Challenge

- 29.** We support the strong evidence base provided by the Strategy and recommend the following additions:
- Condensing the section to provide a high-level narrative of warming trends and the implications for water security.

- Including impact of flooding on the water bulk mains which makes the network vulnerable and increases the risk to water security.
- Including resilience of infrastructure as a key security challenge exacerbated by the impacts of climate change.

Water Resource State and Trends

30. We suggest dividing the section into sub headers to demonstrate the current state, influences, and future considerations. These may include major water source, minor water source, rainfall trends in the region, flows and significant Infrastructure e.g., controlled dams.
31. Figures 4 and 5 are very insightful. Figure 4 could become clearer with a key to clarify what SW and GW means (SW = surface water, GW = groundwater).
32. With Hamilton City being a Tier 1 metro city, ensuring an ongoing optimum water supply and adequate allocation of water for Hamilton is one of the key roles of Hamilton City Council. The Waikato Regional Council has a responsibility of allocating water whilst maintaining ecological flows. Hamilton City Council has water demand management programmes to ensure that water allocated to Council from the awa is carefully managed and recognises Te Mana o Te Wai and Te Ture Whaimana o te Awa o Waikato.
33. Council must also meet its own legislative obligations under various key pieces of legislation, such as the Water Services Act, the Local Government Act and the National Policy Statement for Urban Development. Such Acts and National Policy Statements place an obligation on Council to ensure ongoing supply for meeting the health and sanitation needs of people in Hamilton City, as well as contributing towards their social, economic, cultural and environmental wellbeing. Any Water Security Strategy must take this into account. We recommend that the Strategy develop the vision, objectives and goals in alignment with the functions of territorial authorities to enable wider reaching benefits.

Likely Impacts of Climate Change

34. We recommend the Strategy to expand this section to include:
 - Impacts of high erosion events that could decrease water security, and
 - Impacts of warming rivers and streams, and algae issues that could impact water takes and water quality. This could recognise the issue of water being unsafe and unavailable for the environment and people, becomes financially unsustainable to treat and progressively more difficult over time, and impacts on ecosystems.

Water Security Strategy

35. We recommend having the Strategy start early in the document and include the following sections:
 - Vision.
 - Principles.
 - Objectives.
 - Approach and metrics to measure success.

36. The following are some key objectives we would suggest being reflected in the Strategy:
- Reducing reliance on the river by promoting innovation and alternative water sources.
 - Promoting sustainability.
 - Infrastructure resilience.
37. Hamilton City Council staff take the approach of supplementing strategies with action plans that sit outside the Strategy and are updated and monitored regularly. We would recommend that the Waikato Regional Council take a similar approach and involve Hamilton City Council staff in the development of the action plan for Water Security.

Potential Solutions

38. We agree with the statement *“shift our collective thinking from one of operating in a water-rich environment, to operating in an increasingly water-constrained environment”*.
39. We recommend the Strategy to mention the need for funding innovation to better understand alternative water sources.
40. We recommend clarifying the following statement *“Educating regional communities about wise water use to reduce the currently very high per capita consumption”*. In the statement the term ‘communities’ should be expanded to include the industrial and commercial sectors.

Recommendations

41. We recommend that alignment with the Climate Action Roadmap should be considered throughout the Strategy writing process and should not be a later consideration. The Strategy would also need to incorporate upcoming provisions under the Climate Change Adaptation Bill.
42. There is ambiguity on whether these are recommendations for implementing the Strategy or recommendations about the next steps for the Strategy writing process.
43. If the section intends to provide some recommendations regarding the implementation of the Strategy, we suggest embedding ongoing monitoring to measure the success of the Strategy.

Community Wellbeing

44. The Strategy needs to recognise the important role that water service providers play in managing municipal water for communities to meet multiple wellbeing needs and population growth. Any Strategy should remove barriers and priority for municipal water take that is properly planned, allocated and used efficiently.
45. As stated in the Council’s submission to the Natural and Built Environment Bill ([refer here](#)), the Council *“consider it necessary that priority is given to municipal water authorities applying for water take and discharge consents for the purpose of municipal water activities”*.
46. We would recommend the Strategy to consider the issues faced by territorial authorities provide actionable solutions through the Strategy.

Future Collaboration

47. We agree that a water security roadmap is very much needed across the region and across all sectors. The Waikato Regional Council is ideally placed to coordinate/lead this as the entity that has an overarching role across water use and regulation. We recommend that the Waikato Regional Council to work with Hamilton City Council staff to:
- Define clear regional objectives and outcomes sought for the Strategy, ensuring that best use is made of existing local material.
 - Make sure that the Strategy and water security roadmap development process is inclusive, efficient, fit for purpose and makes best use of existing expertise across the region.
 - Establish an appropriate working forum to provide input to the Strategy and water security roadmap development.
 - Drive roadmap development.

Further Information and Opportunity to Discuss our Feedback

48. Should the Waikato Regional Council require clarification of the feedback from Hamilton City Council staff, or additional information, please contact **Hannah Windle** (Special Projects Manager) on 07 838 6553 or email hannah.windle@hcc.govt.nz in the first instance.
49. Hamilton City Council staff would welcome the opportunity to discuss the content of our feedback with the Waikato Regional Council in more detail and to be involved in any further targeted consultation prior to the Strategy being approved in June 2023.

Yours faithfully



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